



RCVD APR 19 2018

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**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-1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

Type of Activity

**Import of Sport-hunted Trophies of Southern  
African Leopard and Namibian Southern White  
Rhinos**

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 <b>Lipworth</b>	1.b. First Name <b>Alexander</b>	1.c. (b) (6)	1.d. Suffix
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, etc.) (b) (6)		1.e. Country/Province		1.f. Country <b>USA</b>
1.b. City <b>Opal Locks</b>	1.c. State <b>FL</b>	1.d. Zip code/Postal code (b) (6)		
2.a. Mailing address (include if different than physical address; include name of company, etc.)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. Country/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>Lipworth</b>	<b>4/17/2018</b>

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit to the address on page one.**

**Note 2:** 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:** *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 4:** Certain hunting trophies, including leopard 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.

- **Complete all questions on the application.**
- **Mark questions that are not applicable with "N/A".**
- **If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.**
- **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.  
Attn: Jeremy DeLaCruz  
434 Rozzi Place  
South S.F., CA 94080

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

Myra Ravin + 305 986 5553 myra@invincibleboats.com  
or  
Jeremy DeLaCruz 650-872-1225 jdelacruz@coppersmith.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.

N/A

4. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

- a. Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20.
- b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity:        (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).

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 ANIMAL HAS ALREADY BEEN TAKEN, please enter the following:

- d. 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, NYAE NYAE conservancy, Otjozondjupa Region

- e. Date wildlife is to be hunted:

26 October 2017

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

Stefan m jacobson  
smj safaris

g. 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]:

Farm Aandster #915, P.O. Box 601  
Grootfontein  
Namibia

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.

- a. 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: S.m. Jacobs  
Business Name: smj safaris  
Address: Farm Aandster #915  
Address: P.O. Box 601  
City: Grootfontein  
State/Province:  
Country, Postal Code: Namibia

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. 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.

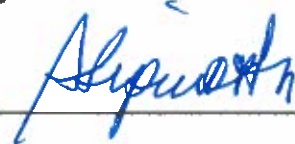
N/A

Taxidermist/Broker's signature: \_\_\_\_\_ Date: \_\_\_\_\_

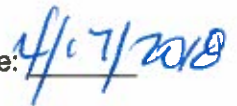
10. If you are the hunter applying to import your own trophy, please read and sign the following statement.

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.*

11. 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).

**MINISTRY OF ENVIRONMENT AND TOURISM**

Directorate Natural Resources Management  
Private Bag 13306  
Windhoek, Namibia  
Enquiries: Chief Warden,  
Permit Office



Tel: +264-61-284 2111  
Fax: +264-61-258 861

PERMIT No.:

175101

VALID FROM:

18.10.17

VALID TO:

03.11.17

RECEIPT No.:

2169927

## PERMIT TO HUNT FOR TROPHIES

Permission is hereby granted in terms of the Nature Conservation Ordinance 1975 (Ord. 4 of 1975)

Name of Trophy Hunter: **A. (b) (6) Lippworth**

Residential Address:

Country: **U.S.A.**

To hunt the specified number of game for the sake of trophies:

Indicates species listed on CITES  
Appendix I or II

SPECIES: COMMON NAME	Number
Buffalo	
<del>SAP</del> I Crocodile	
Dik-dik	
Eland	
<del>SAP</del> II Elephant	
Giraffe	
Grey Duiker	
<del>SAP</del> II Hippopotamus	
Impala, Black-faced	
Impala, common	
Klipspringer	
Kudu	
<del>SAP</del> II Leshwe	
Oryx (Gemsbok)	
Ostrich	
Red hartebeest	
Reedbuck	
<del>SAP</del> I Rhinoceros, black	
<del>SAP</del> I Rhinoceros, white	
Roan	
Sable	
Springbok	

SPECIES: COMMON NAME	Number
Steenbok	
Warthog	
Waterbuck	
Wildebeest, blue	
Zebra, Burchell's	
<del>SAP</del> II Zebra, Hartman's mountain	
Blesbok	
Wildebeest, black	
<del>SAP</del> I Cheetah	
<del>SAP</del> I Leopard (Male)	IX
<del>SAP</del> II Lion	
Other	
* Subject to the attached prohibitory trophy hunting conditions	
* NOT to be used MET - only for hunt	

on the following farms / hunting concessions: **Nyene-Nyene Conservancy**

Guided by (name of guides): **S.M. Jacobs**

MINISTRY OF ENVIRONMENT & TOURISM  
**Archibius R. Kitchas**  
ISSUING OFFICIAL (NAME & SIGNATURE)  
UNDER THE AUTHORITY OF THE MINISTER  
POHAMBASHIETA IN TERMS OF SECTION  
73 (1) OF THE NATURE CONSERVATION  
ORDINANCE, 1975 (ORDINANCE NO. 4  
OF 1975) AS AMENDED.

**MPP 205/256**  
**(2017)**  
Official MET date stamp

2017-10-11

**IMPORTANT: This permit is not valid if altered in anyway**



The following certificate must be completed immediately after each animal that has been hunted (please print)

175 161

Date	Species	LH*	RH*	LB*	RB*	Total	RW*	Age	Male/ Female	Farm		Signatures		
										Name	No	Farm owner	Hunter	Professional hunter Master hunting guide Hunting guide
26/10/17	Leopard	24	15			39		0	M.	Nyau Nyau Cons.				
<p>We hereby individually and collectively declare that the predator recorded and photographed was hunted shot and killed by us in full accordance with all the predator trophy hunting permit conditions.</p> <p>A Lipworth A Symon</p> <p>S M Jacobs nfl</p> <p>Reported: R. Jansen 27/10/2017.</p>														

\*L= Left, R=Right, Horn, B=Base, RW=Rowland Ward

No trophy hunter may hunt unless accompanied by a professional hunter, master hunting guide or hunting guide.

This permit must be kept on the person of the permit holder at all times while hunting.

Only guide(s) as specified on the permit may conduct the hunt.





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 of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros

RCVD AUG 31 2017

LS

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 Rains	1.b. First name Kent	1.c. Middle name or initial	1.d. Suffix
(b) (6)		5. Affiliation/ Doing business as (see instructions)	
		6.d. E-mail address laura.durgin@dlchb.com	

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. (b) (6)			
1.b. City Lenexa	1.c. State KS	1.e. (b) (6)	1.f. Country 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 <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) <u>Laura Durgin</u> Date of signature (mm/dd/yyyy) <u>08/30/2017</u>	

Please continue to next page



**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**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 were 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:** The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: N/A (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: N/A (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

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, horns, tusks).

N/A

3. **IF THE ANIMAL IS DEAD**, please enter the following:

a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: Nuanetsi Southern Section, Masvingo Province, Zimbabwe

b. Date wildlife was hunted:

07/12/2017



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

Skull, Fullskin, 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 document]:

Safari Air Services  
733 Iona Close  
Borrowdale  
Harare, 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 appear on the face of the export permit].

Name:

Business Name: Safari Air Services

Address: 733 Iona Close

Address:

City: Borrowdale

State/Province: Harare

Country, Postal Code: Zimbabwe

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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:

Laura Burgin

Date:

08/30/2017

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 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.*



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).

CHICAGO, IL

9. 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):

 D & L CHB  
1500 Midway Ct.  
Ste W201  
Elk Grove Village, IL 60007

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. N/A

☐ 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):

Laura Durgin  
847-690-0690  
laura.durgin@dlchb.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.







**CUSTOMS POWER OF ATTORNEY**  
and  
**Acknowledgement of Terms and Conditions of Service**

Copyright 1995, National Customs Brokers and Forwarders Association of America, Inc.  
(Revised 07/04)

✓ appropriate box:

- ☒ Individual  
☐ Partnership  
☐ Corporation  
☐ Sole Proprietorship  
☐ Limited Liability Company

SS# ✓

(b) (6)

KNOW ALL MEN BY THESE PRESENTS: That, ✓ Kent Rains (Full name of individual, partnership, corporation, sole proprietorship, or limited liability company) (Identify) doing business as a ✓ INDIVIDUAL (Individual, partnership, corporation, sole proprietorship) (b) (6) under the laws of the State of ✓ Kansas (b) (6) residing or having a principal place of business at ✓ Lenexa (b) (6), 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, unloading 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, unloading, 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 ✓ Kent Rains (Full name of company) caused these presents to be sealed and signed: (Signature) ✓ [Signature]  
(Capacity) ✓ N/A Date: ✓ 6/22/17  
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.



To: Laura Durgin <Laura.Durgin@dlchb.com>

Subject: Permit for Rains 52305C

Laura,

Please clarify what you attempting to do. I see a note on the back of the check saying this application is for a replacement permit with the correct fee for a duplicate permit, however the application is on a request for a new permit.

If this is a request for a duplicate document form 3-200-66 should be completed and sent to my attention.

If this is for a new application; the application fee is \$100 and not \$50. . . Please provide an additional check for \$50.

Please return either item to my attention along with a copy of this email identifying this application.

(If we do not receive the information requested above within **45 days** from the date of this letter, your incomplete application will be placed in our inactive files and we will not complete your request for a permit.)

Thank you,

**Tim Mac Donald**

**Legal Instrument Examiner**

**Division of Management Authority**

**Branch of Permits; MS: IA**

US Fish and Wildlife Service

5275 Leesburg Pike


Falls Church, VA 22041-3805

(w) 703-358-2256

(F) 703-358-2280

Interested in international conservation? Sign up for our e-newsletter! [Sign up](#)

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 **copy of check\_1.pdf**  
312K



MacDonald, Tim &lt;tim\_macdonald@fws.gov&gt;

**Re: Permit for Rains 52305C**

1 message

**MacDonald, Tim** <tim\_macdonald@fws.gov>  
To: Laura Durgin <Laura.Durgin@dlchb.com>

Wed, Jan 24, 2018 at 12:59 PM

Laura,

Yes, this permit is for Kent Rains. I am attaching a copy of the check that is in the file.

I am sorry it has taken so long to get back to you, but all trophy applications were put under review some time ago and are just now being processed.

Concerning the check, it is possible the checks got mixed up while being input. If you can send me a copy of the correct check and I can research the payment.

Thank you,

**Tim Mac Donald**

**Legal Instrument Examiner**  
**Division of Management Authority**  
**Branch of Permits; MS: IA**  
US Fish and Wildlife Service  
5275 Leesburg Pike  
Falls Church, VA 22041-3805

(w) 703-358-2256

(F) 703-358-2280

On Thu, Oct 19, 2017 at 9:34 AM, Laura Durgin <Laura.Durgin@dlchb.com> wrote:

Hi Tim

I was not aware of a note on the back of the check. If there was then it was a mistake for that to be there. The check I show for Kent Rains permit is for \$100.00 I can send you a copy of it. This is for a new permit. Please let me know if you need anything else. Sorry for any confusion.

Thanks &amp; B Rgds,

Laura Durgin

D&L CHB, LLC  
Tele: 847-690-0690  
Fax: 847-690-0699

Cell: 847-708-7505

**From:** MacDonald, Tim [mailto:tim\_macdonald@fws.gov]  
**Sent:** Tuesday, October 17, 2017 3:28 PM







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: 1A  
3275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

Type of Activity:  
Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros

RECD DEC 10 2017

LB

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

A. Complete if applying as an individual			
1.a. Last name <b>Bolin</b>	1.b. First name <b>Ricardo</b>	1.c. Middle name or initial <b>(b) (6)</b>	1.d. Suffix <b>—</b>
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Social Security No. <b>(b) (6)</b>	4. Occupation <b>(b) (6)</b>	5. Affirmation: Doing business as (see instructions) <b>NA</b>
6. <b>(b) (6)</b>			

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>(b) (6)</b>			
1.c. State <b>Ohio</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. Country <b>USA</b>	
2.a. Mailing Address (include if different than physical address; include no. if P.O. Box) <b>(b) (6)</b>			
2.b. City <b>Rutland</b>	2.c. State <b>Ohio</b>	2.d. Zip code/Postal code <b>(b) (6)</b>	2.e. Country/Province <b>USA</b>

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <b>Ricardo Bolin</b> <b>(b) (6)</b> Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) <b>12-6-17</b>	

Please continue to next page



**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**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 were 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:** The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: N/A (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). Note: once imported, ivory cannot be re-exported.

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: N/A (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

2. IF ANIMAL IS CURRENTLY LIVING IN THE WILD, please enter the following:
- Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
  - Date wildlife is to be hunted:
  - Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).
3. IF THE ANIMAL IS DEAD, please enter the following:
- Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: ~~Namibia~~ Namibia, Ouisume #189, Otjomuwa #190
  - Date wildlife was hunted: Grootfontein

5-26, 5-27 2017

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

Full Mount, skull, lower jaw bone 2x 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 document]:

Karel William Jakobus Van Heerden  
born 1959  
Otjiwarongo, Namibia

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 appear on the face of the export permit].

Name: Titus Schmidt  
Business Name: yellow shack LLC  
Address: 1209 Orange St.  
Address:  
City: Wilmington, DE 19801  
State/Province: DE  
Country, Postal Code: 19801

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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: Ricardo (b) (6) Belin \_\_\_\_\_ Date: 12-7-2017

*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 government to conduct your propose activity. While the Service will attempt to assist where possible, 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/e/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).

Chicago, Ill.

9. 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):

Ricardo (b) Bolin

(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):

Rick Bolin - (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.

The following certificate must be completed immediately after each animal that has been hunted (please print)

[illegible]

\*L=Left, R=Right, H=Horn, B=Base, RW=Rowland Ward

No trophy hunter may hunt unless accompanied by a professional hunter, master hunting guide or hunting guide.

This permit must be kept on the person of the permit-holder at all times while hunting.

Only guide(s) as specified on the permit may conduct the hunt







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: 1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

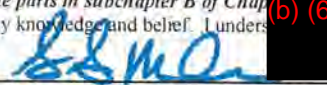
**Type of Activity:**  
**IMPORT OF SPORT-HUNTED TROPHIES**  
**(Appendix I of CITES and/or ESA)**

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.

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

<b>B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution</b>			
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

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

<b>D. All applicants MUST complete</b>	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA04168C-1 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter (b) (6) 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) 12/15/2017	

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.  
Genus & Species: *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:  
July 7, 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 skull 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):  
Zimbabwe, Buby Valley Conservancy, 007 209
  - b. Date wildlife was hunted:  
July 17, 2016



- 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]:

LD Forwarding Co LTD  
P O Box GD 467  
Greendale, Harare

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: Lynn Duncan  
Business Name: LD Forwarding Co LTD  
Address: P O Box GD 467  
Address: Greendale  
City: Harare  
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)


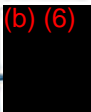
6. **If you are a broker or taxidermist applying on behalf of a foreign national**, provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

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:   (b) (6) Date: 12/15/2017

*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):

(b) (6)

Lawrenceville, GA (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):

Chad Milner

(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.







# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

International Affairs

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In Reply Refer To:  
FWS/AIA/DMA/69772C

### Enhancement Finding

Applicant: Seixas (b) (6) Milner, (b) (6) (PRT – 69772C)

Seixas (b) (6) Milner, (b) (6) submitted an application on December 20, 2017, for the importation of one male lion (*Panthera leo melanochaita*) taken from Buby Valley Conservancy, 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 July 17, 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 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 Zimbabwe.

#### 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. Milner'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. Milner'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. Milner'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 Bulyape 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), Chimanmani, 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 loss 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<sup>2</sup> of land where some form of wildlife based land use is practiced in Zimbabwe. Lions occur permanently in 45% of this available range (c. 145,000km<sup>2</sup>), 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<sup>2</sup> 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<sup>2</sup> 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 Bulyana) 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<sup>2</sup> 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 13<sup>th</sup> 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<sup>2</sup> 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  $0.3 \pm 0.1/100 \text{ km}^2$  for female lions; during the same period, actual offtake was lower at  $0.08 \pm 0.1/100 \text{ km}^2$ , 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 to ZPWMA'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<sup>2</sup>; the 2015 offtake would have accounted for 0.125 lions/1,000 km<sup>2</sup>.



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. Milner 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. Milner's sport-hunted trophy taken in Zimbabwe on July 17, 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. Milner 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. Seixas (b) (6) Milner, (b) (6) of Watkinsville, Georgia.**

 6/9/18  
Anna Barry, Acting Team Leader  
Branch of Permits  
Division of Management Authority

 6/8/2018  
Mary Coglian, Chief  
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Permit Number: MA69772C-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 Cogliano*  
CHIEF, BRANCH OF PERMITS, DMA

Permittee:

SEIXAS (b) (6) MILNER (b) (6)  
(b) (6) (b) (6)  
WATKINSVILLE, GA (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).





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

DEC 21 2017

OMB No. 1018-0164  
Expires 11/30/2016

**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 of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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 GOODLOW-BEHREND	1.b. First name MARILYN	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Occupation (b) (6)		
4. Affiliation/ Doing business as (see instructions) (b) (6)		5.d. E-mail address jlanahm@well-usa.com	
5.c. Fax number		5.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		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 WYALUSING	1.c. State PA	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province (b) (6)	1.f. Country USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) SAME				
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 17US49656C/9 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Signature of applicant/person responsible for permit (No photocopied or stamped signatures) <i>Jm Lanham</i> Date of signature (mm/dd/yyyy) <i>12/21/17</i>	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:

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

b. Date wildlife was hunted: HARDAP HAMMERSTEIN #102, MALTAHOHE, NAMIBIA  
05/17/2017

- 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

- 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]:

SAFARI CARGO, HOLDING 34, 5TH AVENUE, BREDELL, 1623 GUATENG, R.S.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 appear on the face of the export permit].

Name: Business NYATI WILDLIFE  
Name: Address: PO BOX 20333  
Address: WINDHOEK  
City: NAMIBIA  
State/Province:  
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one 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.*

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 USA*

9. 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):

WELL WORLDWIDE ENERGY LOGISTICS  
17401 ALDINE WESTFIELD ROAD, HOUSTON TX 77073

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):  
JOY LANHAM; (281) 606-2400, [jlanham@well-usa.com](mailto:jlanham@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.









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 DEC 20 2017

LB

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

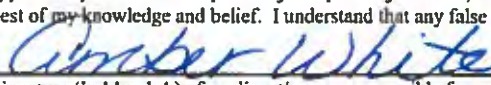
Type of Activity:  
Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros

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 Vance	1.b. First name Tim	1.c. Middle name or initial	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) (b) (6)	2. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
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 Clover	1.c. State SC	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province	1.f. Country USA	
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)					
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country	

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

Please continue to next page



## **E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**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 were 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:** The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: 0 (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: 0 (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

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, horns, tusks).

### **3. IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: Hunting Concession - ONDAUSU #116, Omaruru, Namibia
- b. Date wildlife was hunted:  
Oct 16, 2016



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

Lifesize mount & Processed (bleached) 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 document]:

1175 Athabasca St E  
Moose Jaw, SK  
S6H0N4

ORION TAXIDERMY

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 appear on the face of the export permit].

Name: Amber White  
Business Name: Rigel Logistics / Orion Taxidermy  
Address: 1175 Athabasca St E  
Address:  
City: Moose Jaw  
State/Province: SK  
Country, Postal Code: S6H0N4

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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: Amber White Date: Dec 4/17

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 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.*

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).

Dunseith, ND

9. 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):

Orion Taxidermy  
1175 Athabasca St E  
Moose Jaw, SK  
S6H0N4

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):  
Amber White (306) 692-4653

rigel@sasktel.net

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.



Republic of Namibia

**MINISTRY OF ENVIRONMENT AND TOURISM**

Tel: +264-61-284 2111

Fax: +264-61-259101

E-mail: [iifo.fillemon@met.gov.na](mailto:iifo.fillemon@met.gov.na); [josefina.shapi@met.gov.na](mailto:josefina.shapi@met.gov.na)

Directorate Scientific Services

CITES Management Section

Private Bag 13306

WINDHOEK

Namibia



Management Authority of Namibia

**EXPORT CONFIRMATION CERTIFICATE**

THE MINISTRY OF ENVIRONMENT AND TOURISM IS THE CITES MANAGEMENT AND SCIENTIFIC AUTHORITY AND AS SUCH CERTIFIES THAT:


IMPORTER	EXPORTER
Rigel Logistics Amber White 1175 Athabasca St. E. Moose Jaw Saskatchewan S6H 0N4 Canada	Nick Nolte P.O. BOX 611 Omaruru Namibia

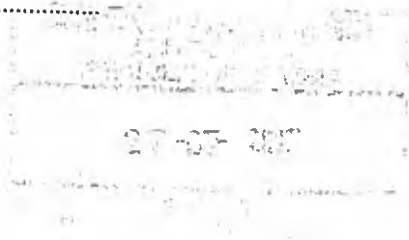
- A) Obtained the following trophy/trophies, in accordance with the Namibian National Legislation on 16/10/2016 with trophy hunting permit number 166691
- B) The export of this specimen(s) is not detrimental to the survival of the Namibian Leopard population.

TYPE OF TROPHY
skull & skin

The trophy is marked with the following tag number: NAPP 16/250 (2016)

IN ACCORDANCE WITH ARTICLE III OF THE CITES CONVENTION, AN EXPORT PERMIT WILL BE ISSUED UPON RECEIPT OF AN IMPORT PERMIT FROM THE COUNTRY OF DESTINATION.

  
.....  
Licensing official





Environment Canada  
Environnement Canada

Canada



Convention on International Trade in Endangered Species of Wild Fauna and Flora / Convention sur le commerce international des espèces de faune et de flore sauvages menacées d'extinction

# IMPORT PERMIT PERMIS D'IMPORTATION

## 6. Permittee / Détenteur

Rigel Logistics  
c/o Amber White  
1175 Alhambra St. E  
Moose Jaw, Saskatchewan  
S6H 0N4 Canada

Tel: 308-893-1723

1. Permit/Certificate No. /  
N° du permis/certificat:

17CA01921/CWHQ

2. Date of issue /

Date de délivrance 2017/06/12  
(y-m/d-j)

3. Valid until /

Valable jusqu'au: 2018/06/12  
(y-m/d-j)

4. Purpose of the transaction /  
But de la transaction:

H

## 7. Consignee or supplier / Destinataire ou fournisseur

Nick Nolte  
P.O. BOX 611  
Omaruru  
9000 Namibia

5. Special conditions and other information /  
Conditions particulières et autres renseignements

- ENDORSEMENT BY CUSTOMS COMPULSORY  
- TO BE VALID, THIS PERMIT MUST BE ACCOMPANIED BY A CITES EXPORT PERMIT ISSUED BY THE EXPORTING COUNTRY.

8/9. Scientific name (genus and species) and common name / Nom scientifique (genre et espèce) et nom commun	10. Description of specimens, including marks (age/sex, if live) / Description des spécimens, y compris les marques (âge/sex, si vivant)	11. Appendix / Annexe	12. Source / Source	13. Quantity (incl. unit) / Quantité (et unité)	14. Exported-Quota / Exporté-Quota
A 8/9. <i>Panthera pardus</i> Leopard	10. Lifesize Scaled Cape, Tag #: NAPP 11/250 (2016), Hunting Permit Number: 166691	11. —	12. W	13. — 1 —	14. [Redacted]
15a. Country of origin / Pays d'origine	Permit No. / N° de permis	Date (y-m/d-j)	15b. Country of last re-export / Pays de provenance	Certificate No. / N° de certificat	Date (y-m/d-j)
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
B 8/9. <i>Panthera pardus</i> Leopard	10. Skull, Hunting Permit Number: 166691	11. —	12. W	13. — 1 —	14. [Redacted]
15a. Country of origin / Pays d'origine	Permit No. / N° de permis	Date (y-m/d-j)	15b. Country of last re-export / Pays de provenance	Certificate No. / N° de certificat	Date (y-m/d-j)
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
C 8/9.	10.	11.	12.	13.	14.
15a. Country of origin / Pays d'origine	Permit No. / N° de permis	Date (y-m/d-j)	15b. Country of last re-export / Pays de provenance	Certificate No. / N° de certificat	Date (y-m/d-j)
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]

## 17. FOR CUSTOMS USE ONLY / RÉSERVÉ AUX DOUANES

Bill of Lading/Air Waybill no. /  
N° de connaissement/lettre de transport aérien

Total no. of shipping containers /  
Nombre total de boîtes expédiées

Customs Endorsement / Validation par les douanes

Block / Quantity/  
Section Quantité

A	
B	
C	

Stamp / Estampille

Signature of Inspecting Officer /  
Signature de l'agent inspecteur

## 18. THIS PERMIT/CERTIFICATE IS ISSUED BY / CE PERMIS OU CERTIFICAT EST DÉLIVRÉ PAR

Adel Farjani

Name / Nom

2017/06/12

Issue / Date de délivrance  
(y-m/d-j)



Management Authority Stamp / Estampille de l'organe de gestion

This permit/certificate is issued under the authority of the Wild Animal and Plant Protection and Regulation of International and Interprovincial Trade Act /  
Ce permis/certificat est délivré en vertu de la Loi sur la protection d'espèces vulnérables et végétales sauvages et la réglementation de leur commerce international et interprovincial.



**MINISTRY OF ENVIRONMENT AND TOURISM**

Directorate Scientific Services  
Private Bag 13306  
Windhoek, Namibia  
Enquiries: Chief Warden,  
Permit Office



Tel +264-61-254 2111  
Fax +264-61-258 861

PERMIT No.:

VALID FROM:

03.10.2016

VALID TO:

15.10.2016

## PERMIT TO HUNT FOR TROPHIES

Permission is hereby granted in terms of the Nature Conservation Ordinance 1975 (Ord. 4 of 1975)

Name of Trophy Hunter:

Timothy

(b) (6)

Vance

Residential Address:

Country:

U.S.A

to hunt the specified number of game for the sake of trophies:



Indicates species listed on CITES  
Appendix I or II

SPECIES: COMMON NAME	Number
Buffalo	
Crocodile	
Dik-dik	
Eland	
Elephant	
Giraffe	
Gray Duiker	
Hippopotamus	
Impala, Black-faced	
Impala, common	
Klipspringer	
Kudu	
Lechwe	
Oryx (Gemsbok)	
Ostrich	
Red hartebeest	
Reedbuck	
Rhinoceros, black	
Rhinoceros, white	
Roan	
Sable	
Springbok	

SPECIES: COMMON NAME	Number
Steenbok	
Warthog	
Waterbuck	
Wildebeest, blue	
Zebra, Burchell's	
Zebra, Hartman's mountain	
Elesbok	
Wildebeest, black	
Cheetah	
Leopard (male)	ix
Lion	
Other	

\*Subject to  
attached predator  
trophy hunting  
conditions

\*Please report  
back within  
48 hours after  
shooting

on the following farms / hunting concessions:

Ondousu #116

Guided by (name of guides):

N.J. Nolte

NAPP 16/2016

NAPP 2016/250

Cashier receipt No.:

MET 69073

Issued on:

30.09.2016

Amount received: N\$

100.00

Authorizing officer

IMPORTANT: This permit is not valid if altered in any way.

Official MET data stamp

MINISTRY OF ENVIRONMENT AND TOURISM  
REPUBLIC OF NAMIBIA

2016-09-30



December 4, 2017

I Tim Vance give my permission for Orion Taxidermy / Rigel Logistics to apply for the importing CITES permit for my leopard.

Tim Vance (b) (6)

A handwritten signature in black ink, appearing to read "Tim Vance", is written over a large black rectangular redaction box. The signature is cursive and fluid.



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

OMB No. 1018-0164  
Expires 11/30/2016

**Federal Fish and Wildlife Permit Application Form**

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

**Type of Activity:**

**Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

RCVD DEC 20 2017

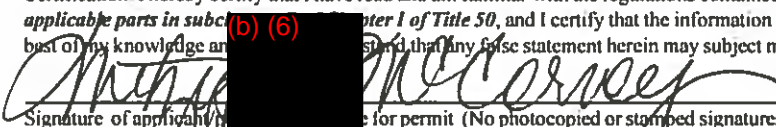
LB

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

<b>A. Complete if applying as an individual</b>			
1 a. Last name McCorvey	1 b. First name Mitzy	1 c. Middle name or initial (b) (6)	1 d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Occupation	4. Affiliation/ Doing business as (see instructions)	
5 a. Telephone number (b) (6)	5 b. Alternate telephone number	5 c. Fax number	5 d. E-mail address (b) (6)

<b>B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution</b>			
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

<b>C. All applicants complete address information</b>			
1 a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes) (b) (6)			
1 b. City Houston	1 c. State Tx	1 d. Zip code/Postal code (b) (6)	1 e. Country 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. Country/Province
2 f. Country			

<b>D. All applicants MUST complete</b>	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – <i>attach documentation of fee exempt status as outlined in instructions.</i> (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in <i>Title 50, Part 13 of the Code of Federal Regulations</i> and the other applicable parts in subchapter 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/agent for permit (No photocopied or stamped signatures)	
Date of signature (mm/dd/yyyy) 12/05/2017	

Please continue to next page



**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

N/A

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: ZIMBABWE - Matabeleland Province

- b. Date wildlife was hunted: May 15, 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, 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 document]:

Mapassa Big Game Hunting  
10 Luton Street 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 appear on the face of the export permit].

Name: Business           Maple Freight  
Name: Address:         4 Josiah Chinamana St  
Address:  
City:                    Belmont  
State/Province:        Bulawayo, Zimbabwe  
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the (b) (6) ed States, cannot be re-exported.

Applicant's signature: \_\_\_\_\_

*Mitzy McCorvey*

Date: \_\_\_\_\_

*12/5/17*

*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.*

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).

*Unknown at this time*

9. 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):

*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):

*Tony or Mitzy McCorvey* (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.







**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 <i>Blake</i>	1.b. First Name <i>James</i>	1.c. Middle Name (b) (6)	1.d. Suffix
--------------------------------	---------------------------------	-----------------------------	-------------

(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 #, or P.O. Box) (b) (6)			
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. Country
<i>Kasilof</i>	<i>Alaska</i>	(b) (6)	<i>USA</i>
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. Country
<i>Kasilof</i>	<i>Alaska</i>	(b) (6)	<i>USA</i>

**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 <b>Title 50 Part 13 of the Code of Federal Regulations</b> 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) <i>James Blake</i>	Date of signature (mm/dd/yyyy) <i>4-17-2018</i>

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.

(b) (6)  
James Blake  
Lake Havasu, AZ (b) (6)

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

James (b) (6) Blake (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.

b. Sex (if known). *Male*

*Loxodonta Africana*

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:

*Zee Koepan Game Farm P.O. Box 696 Pangola 3170  
Magudu Vergelegen Farm 639 R69 Magudu  
District Paulpietersburg Province-KwaZulu-Natal*

b. Date wildlife is to be hunted: *April 1<sup>2018</sup> to Sept 1 2018*

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

*Mr. W.D. Basson  
ID #: 6003065009084*

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 Have not hunted yet Ordinary Permit OP 1121/2018*
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:

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?

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?

no

- 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: NA 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: James (b) (6) Blake Date: 4-17-2018

*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).



Conservation, Partnerships & Rehabilitation

ORIGINAL

## ORDINARY PERMIT

Fee: R 1 100,00  
Receipt No: 1195/2018

Permit No: OP 1121/2018  
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: (b) (6)

James Blake  
c/o "Vergelegen Farm 639"  
PO Box 354  
Pongola  
3170

Residential Address

c/o "Vergelegen Farm 639"  
Magudu  
R69  
Pongola

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 Vergelegen Farm  
Magudu,

AFRICAN ELEPHANT  
1 (One) Male

(LOXODONTA AFRICANA)

**Hunting Client:**

J Blake  
Passport: (b) (6)

Residential: Adventures unlimited  
Kasilof Alaska  
99610  
USA

Postal: Adventures unlimited  
Kasilof Alaska  
99610  
USA

**Please read the Terms and Conditions under which this Permit is issued**

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 09 March 2018

for CHIEF EXECUTIVE

James (b) (6) (b) (6)  
Permit Holder

EZEMVELO KZN WILDLIFE PERMITS OFFICE  
PO Box 13053, Cascades, 3202, Pietermaritzburg, KwaZulu-Natal.  
Tel +27 33 845 1320 / 1324, Fax: +27 33 845 1747, Fax to Email: 086 529 3320  
Email: permits@kznwildlife.com. Website: www.kznwildlife.com



Conservation Partnerships & Ecotourism

ORIGINAL

**Hunting Outfitter:**

Mr W D Basson  
ID Number: 6003065009084

Residential: Zeekoepan Farm  
Magudu  
Pongola  
3170

Postal: Zeekoepan Game Farm  
P O Box 696  
Pongola  
3170

**Professional Hunter:**

Mr W D Basson  
ID Number: 6003065009084

Residential: Zeekoepan Farm  
Magudu  
Pongola  
3170

Postal: Zeekoepan Game Farm  
P O Box 696  
Pongola  
3170

**TERMS AND CONDITIONS UNDER WHICH THIS PERMIT IS ISSUED**

1. It is valid only:
  - (i) from : 01 April 2018  
to : 01 September 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. By signing the permit or licence the holder accepts, and agrees to comply with the conditions under which it is issued.
3. This permit is not transferable
4. Any unauthorised alteration to this permit shall render it invalid
5. This permit is valid only within the province where it was issued
6. 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.
7. This permit shall be invalid until such time that it is signed by the permit holder.

***Please read the Terms and Conditions under which this Permit is issued***

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 09 March 2018

for CHIEF EXECUTIVE

James (b) (6) Mike  
Permit Holder

EZEMVELO KZN WILDLIFE PERMITS OFFICE

PO Box 13053, Cascades, 3202, Pietermaritzburg, KwaZulu-Natal.  
Tel +27 33 845 1320 / 1324. Fax: +27 33 845 1747. Fax to Email: 086 529 3320  
Email: permits@kznwildlife.com. Website: www.kznwildlife.com

OP 1121/2018

Page 2 of 4





ORIGINAL

## ORDINARY PERMIT

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Receipt No: 1195/2018

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The permit is issued to:

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James Blake  
c/o "Vergelegen Farm 639"  
PO Box 354  
Pongola  
3170

Residential Address  
c/o "Vergelegen Farm 639"  
Magudu  
R69  
Pongola

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 Vergelegen Farm  
Magudu,

AFRICAN ELEPHANT (LOXODONTA AFRICANA)  
1 (One) Male

### Hunting Client:

J Blake  
Passport: (b) (6)

Residential: Adventures unlimited  
Kasilof Alaska  
99610  
USA

Postal: Adventures unlimited  
Kasilof Alaska  
99610  
USA

*Please read the Terms and Conditions under which this Permit is issued*

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 09 March 2018

for CHIEF EXECUTIVE

James (b) (6) Blake  
Permit Holder

EZEMVELO KZN WILDLIFE PERMITS OFFICE  
PO Box 13053, Cascades, 3202, Pietermaritzburg, KwaZulu-Natal  
Tel +27 33 845 1320 / 1324. Fax: +27 33 845 1747. Fax to Email: 086 529 3320  
Email: permits@kznwildlife.com. Website: www.kznwildlife.com





ORIGINAL

Formalisation, Partnerships & Recognition

**Hunting Outfitter:**

Mr W D Basson  
ID Number: 6003065009084

Residential: Zeekoepan Farm  
Magudu  
Pongola  
3170

Postal: Zeekoepan Game Farm  
P O Box 696  
Pongola  
3170

**Professional Hunter:**

Mr W D Basson  
ID Number: 6003065009084

Residential: Zeekoepan Farm  
Magudu  
Pongola  
3170

Postal: Zeekoepan Game Farm  
P O Box 696  
Pongola  
3170

**TERMS AND CONDITIONS UNDER WHICH THIS PERMIT IS ISSUED**

1. It is valid only:
  - (i) from : 01 April 2018  
to : 01 September 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 By signing the permit or licence the holder accepts, and agrees to comply with the conditions under which it is issued.
- 3 This permit is not transferable
- 4 Any unauthorised alteration to this permit shall render it invalid
- 5 This permit is valid only within the province where it was issued
- 6 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.
- 7 This permit shall be invalid until such time that it is signed by the permit holder.

***Please read the Terms and Conditions under which this Permit is issued***

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 09 March 2018

for CHIEF EXECUTIVE

James (b) (6) Permit Holder

EZEMVELO KZN WILDLIFE PERMITS OFFICE

PO Box 13053, Cascades, 3202, Pietermaritzburg, KwaZulu-Natal.

Tel +27 33 845 1320 / 1324, Fax: +27 33 845 1747, Fax to Email: 086 529 3320

Email: [permits@kznwildlife.com](mailto:permits@kznwildlife.com). Website: [www.kznwildlife.com](http://www.kznwildlife.com)

OP 1121/2018

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NOV 06 2017



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

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

# Federal Fish and Wildlife Permit Application Form

**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

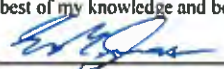
**Type of Activity:**  
**IMPORT OF SPORT-HUNTED TROPHIES**  
(Appendix I of CITES and/or ESA)

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 Swanson	1 b. First name Eric	1 c. Middle name or initial (b) (6)	1 d. Suffix
2 Date of birth (mm/dd/yyyy) (b) (6)	3 Social Security No. (b) (6)	4 Occupation (b) (6)	5 Affiliation/ Doing business as (see instructions)
6 a. Telephone number (b) (6)	6 b. Alternate telephone number	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		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 Dallas	1 c. State TX	1 d. Zip code/Postal code (b) (6)	1 e. Country USA
2 a. Mailing Address (include if different than physical address, include name of contact person if applicable) (b) (6)			
2 b. City Dallas	2 c. State TX	2 d. Zip code/Postal code (b) (6)	2 e. Country 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 <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue. 17US39389C/9 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) 11-01-2017 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 – 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):  
Zimbabwe. Buby Valley Conservancy. Nearest City: Beitbridge
  - b. Date wildlife was hunted:  
May 2, 2017



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

All parts of the animal including the skin, skull, claws, teeth, tail and feet.

- 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]:

15 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: Collett's Wildlife Artistry  
Business Name: Collett's Wildlife Artistry  
Address: 15 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.

**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: 11-01-2017

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

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).
9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):
10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.
- ☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.
11. Who should we contact if we have questions about the application? (Include name, phone number, and email):  
Eric M. Swanson  
(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.





# 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/62286C

Enhancement Finding

Applicant: Eric (b) (6) Swanson (PRT – 62286C)

Eric (b) (6) Swanson submitted an application on November 6, 2017, for the importation of one male lion (*Panthera leo melanochaita*) taken from Buby Valley Conservancy, 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 May 2, 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 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 Zimbabwe.

#### 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. Swanson'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. Swanson'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. Swanson'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 Bvumba Valley Conservancy (BVC) alone during 2015 (K. Leatham, 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), Chimanmani, 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 loss 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<sup>2</sup> of land where some form of wildlife based land use is practiced in Zimbabwe. Lions occur permanently in 45% of this available range (c. 145,000km<sup>2</sup>), 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<sup>2</sup> 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<sup>2</sup> 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 Bulyana) 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<sup>2</sup> 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 13<sup>th</sup> 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<sup>2</sup> 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  $0.3 \pm 0.1/100 \text{ km}^2$  for female lions; during the same period, actual offtake was lower at  $0.08 \pm 0.1/100 \text{ km}^2$ , 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 to ZPWMA'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<sup>2</sup>; the 2015 offtake would have accounted for 0.125 lions/1,000 km<sup>2</sup>.

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 Mwenzezi, 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.

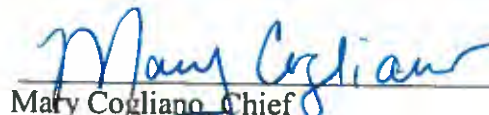
### Conclusion

Given the status of lions within Zimbabwe at the time Mr. Swanson 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. Swanson's sport-hunted trophy taken in Zimbabwe on May 2, 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. Swanson 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. Eric (b) (6) Swanson of Dallas, Texas.

 6/9/18  
Anna Barry, Acting Team Leader  
Branch of Permits  
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 6/8/2018  
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**Permit Number: MA62286C-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

  
CHIEF, BRANCH OF PERMITS, DMA

**Permittee:**

ERIC (b) (6) SWANSON  
(b) (6)  
DALLAS, 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 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).





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

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

RCVD NOV 8 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)

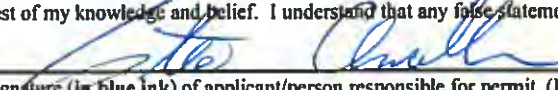
Threatened-listed  
lion

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 Chancellor	1.b. First name Steven	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions) N/A
6.a. Telephone number (b) (6)	6.b. Alternate telephone number (b) (6)	6.c. Fax number (b) (6)	6.d. E-mail address (b) (6)

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

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

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA86473B-0 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures)  Date of signature (mm/dd/yyyy) 11/6/2017	

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.  
2 trophies of *P. l. melanochaita* (African lion)
  - b. Sex (if known).  
Two males
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:
  - 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):  
Zimbabwe, Buby 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.
  - b. Date wildlife was hunted: Hunting area is a wildlife conservancy consisting of 850,000 acres.  
October 2017

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

All parts including skin, skull, teeth, and claws.

- 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, 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: Andy Pugh  
Business Name: Trophy Consultants International  
Address: 4 Josiah Chinamano Road  
Address: Belmont  
City: Bulawayo  
State/Province: 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:  \_\_\_\_\_ Date: 11-8-17

*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.







# 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/62528C

Enhancement Finding  
Applicant: Steven (b) (6) Chancellor (PRT – 62528C)

Steven (b) (6) Chancellor submitted an application on November 8, 2017, for the importation of two male lions (*Panthera leo melanochaita*) taken from Buby Valley Conservancy, 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 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 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 Zimbabwe.

#### 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. Chancellor'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. Chancellor'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. Chancellor'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 Bulyape Valley Conservancy (BVC) alone during 2015 (K. Leatham, 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), Chimanmani, 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 (ZPWMA 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 loss 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<sup>2</sup> 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<sup>2</sup>), 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<sup>2</sup> 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<sup>2</sup> 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 Bulyana) 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<sup>2</sup> 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 13<sup>th</sup> 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<sup>2</sup> 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  $0.3 \pm 0.1/100 \text{ km}^2$  for female lions; during the same period, actual offtake was lower at  $0.08 \pm 0.1/100 \text{ km}^2$ , 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 to ZPWMA'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<sup>2</sup>; the 2015 offtake would have accounted for 0.125 lions/1,000 km<sup>2</sup>.



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.

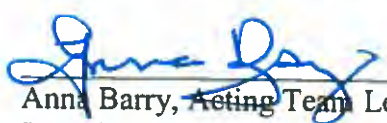
Therefore, based on the information available to the Service, Zimbabwe has the proper expertise, facilities, and other resources to accomplish the objectives laid out in their *Strategy and Action Plan* to enhance the propagation and survival of the species, partly through the utilization of funds generated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

Conclusion

Given the status of lions within Zimbabwe at the time Mr. Chancellor 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. Chancellor's sport-hunted trophy taken in Zimbabwe during October 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. Chancellor 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 two male lions trophies taken in Zimbabwe, to Mr. Steven (b) (6) Chancellor of Evansville, Indiana.

 6/9/18  
Anna Barry, Acting Team Leader  
Branch of Permits  
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 6/8/2018  
Mary Cogliano, Chief  
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Zimbabwe Parks & Wildlife (ZPWMA) and Panthera (2014). Age Restrictions of Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2014). Conservation Status of the African Lion (*Panthera leo*) in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2015). Budget Estimates for the Year 2015.


Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2016). Enhancement and Non-Detriment Findings for *Panthera leo* in Zimbabwe.



**Permit Number: MA62528C-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

  
CHIEF, BRANCH OF PERMITS, DMA

**Permittee:**

STEVEN (b) (6) CHANCELLOR  
(b) (6)  
EVANSVILLE, IN (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 two male African lions (*Panthera leo melanochaita*), taken in Zimbabwe for the purpose of enhancement of the survival of the species.
- B. Specimens may not be sold or transferred for any financial remuneration.
- C. Trophies must have been taken during the 2017 hunting season.
- D. Trophies must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2017 season
- E. Trophies 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).





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: 1A  
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)

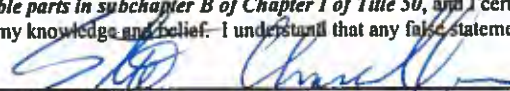
Threatened-  
listed  
lion

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 Chancellor	1.b. First name Steven	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions) N/A
6.a. Telephone number (b) (6)	6.b. Alternate telephone number (b) (6)	6.c. Fax number (b) (6)	6.d. E-mail address (b) (6)

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

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

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? MA86473B-0 Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) 11/6/2017

Please continue to next page

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

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

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

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

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

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

1. For each trophy to be imported, provide:
  - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.  
P. l. melanochaita (African lion)
  - b. Sex (if known).  
Male
2. IF ANIMAL IS CURRENTLY LIVING IN THE WILD, please enter the following:
  - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:  
N/A
  - 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):  
Zimbabwe, Buby 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.
  - b. Date wildlife was hunted: July 7, 2016  
Hunting area is a wildlife conservancy consisting of 850,000 acres.

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

All parts including skin, skull, teeth, and claws.

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

15 Josiah Chinamano Road, 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: 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.

**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: 11/6/2017

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

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

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

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

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

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

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

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

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







# 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/62562C

Enhancement Finding

Applicant: Steven (b) (6) Chancellor (PRT – 62562C)

Steven (b) (6) Chancellor submitted an application on November 8, 2017, for the importation of one male lion (*Panthera leo melanochaita*) taken from Buby Valley Conservancy, 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 July 7, 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 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 Zimbabwe.

#### 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. Chancellor'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. Chancellor'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. Chancellor'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 Bvumba Valley Conservancy (BVC) alone during 2015 (K. Leatham, 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 (ZPWMA 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 loss 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<sup>2</sup> of land where some form of wildlife based land use is practiced in Zimbabwe. Lions occur permanently in 45% of this available range (c. 145,000km<sup>2</sup>), 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<sup>2</sup> 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<sup>2</sup> 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 Bulyana) 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<sup>2</sup> 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 13<sup>th</sup> 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<sup>2</sup> 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  $0.3 \pm 0.1/100 \text{ km}^2$  for female lions; during the same period, actual offtake was lower at  $0.08 \pm 0.1/100 \text{ km}^2$ , 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 to ZPWMA'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<sup>2</sup>; the 2015 offtake would have accounted for 0.125 lions/1,000 km<sup>2</sup>.



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. Swanson 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. Swanson's sport-hunted trophy taken in Zimbabwe on May 2, 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. Chancellor 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. Steven (b) (6) Chancellor of Evansville, Indiana.

  
Anna Barry, Acting Team Leader  
Branch of Permits  
Division of Management Authority

  
Mary Coglian, Chief  
Branch of Permits  
Division of Management Authority



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**Permit Number: MA62562C-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

CHIEF, BRANCH OF PERMITS, DMA

**Permittee:**

STEVEN (b) (6) CHANCELLOR  
(b) (6)  
EVANSVILLE, IN (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 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: 1A  
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 <b>Whitworth</b>	1.b. First Name <b>Kenneth</b>	1.c. Middle Name/Initial <b>(b) (6)</b>	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
1.e. Name of business, agency, tribe, or institution			
1.f. 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>(b) (6)</b>				
1.b. City <b>Hardinsburg</b>	1.c. State <b>KY</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>U.S.A.</b>
2. Mailing address (Include if different than physical address; include name of contact person if applicable) <b>(b) (6)</b>				
2.b. City <b>Hardinsburg</b>	2.c. State <b>KY</b>	2.d. Zip code/Postal code <b>(b) (6)</b>	2.e. County/Province	2.f. Country <b>U.S.A.</b>

## 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) <b>Kenneth Whitworth</b> <b>(b) (6)</b> Date of signature (mm/dd/yyyy) <b>03/16/2018</b>

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 Reser  
Hoedspruit*

b. Date wildlife is to be hunted:

*May 26<sup>th</sup> 2018 to June 24<sup>th</sup> 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: Kenneth (b) (6) Whitworth 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).





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**GENERAL NOTICES • ALGEMENE KENNISGEWINGS**

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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 km<sup>2</sup>. 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 km<sup>2</sup>) 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<sup>2</sup> 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 17<sup>th</sup> 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.

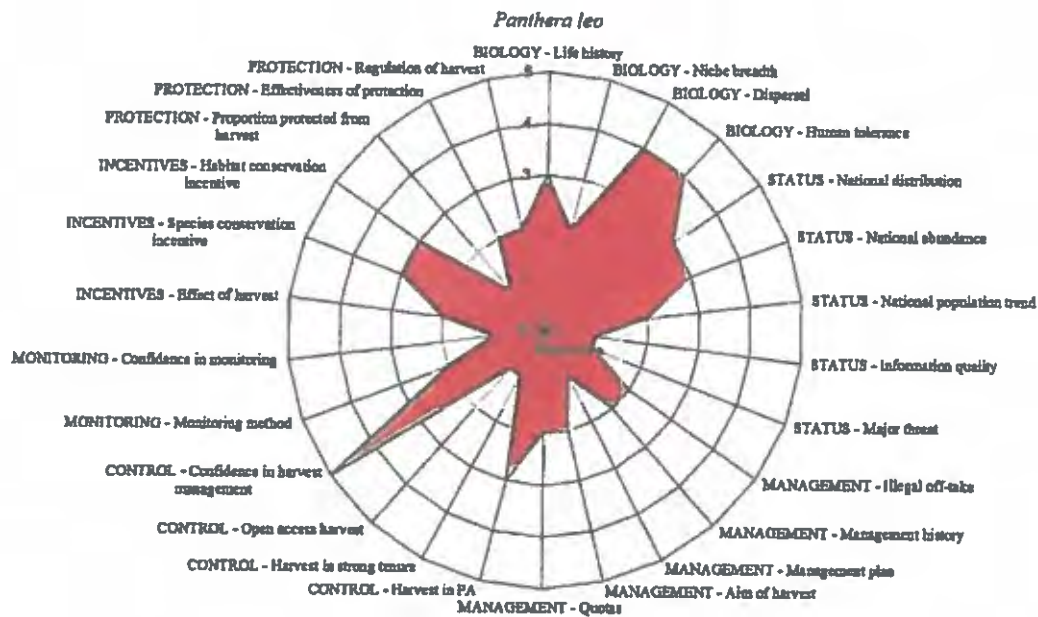


Figure 1: Radar chart summarizing the non-detriment finding assessment for *Panthera leo* (African lion) in accordance with the CITES NDF checklist. Explanations of scores given are detailed in Table 1. Higher scores are indicative of higher risks to the species. The limited area shaded in the radar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

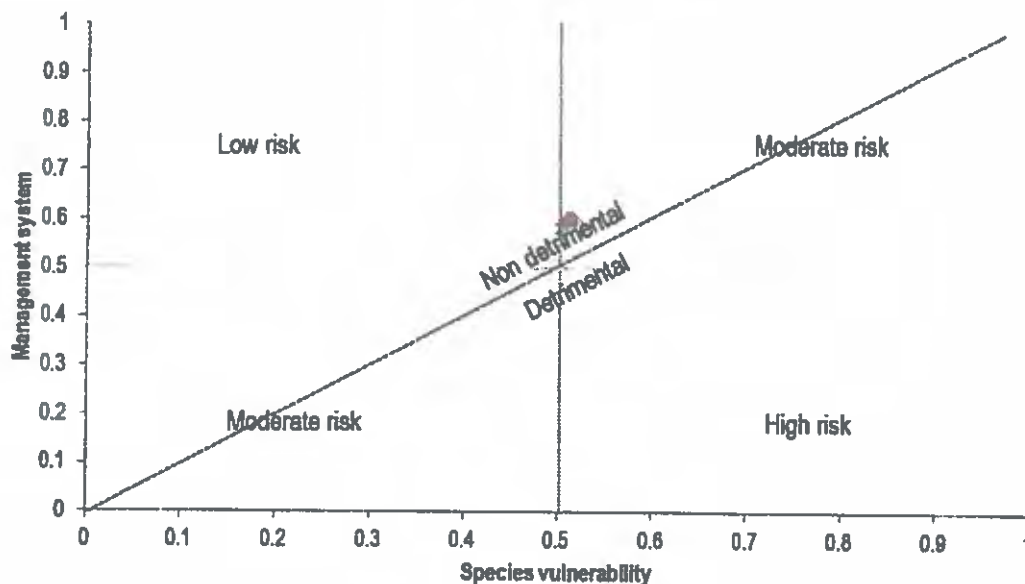


Figure 2: The level of risk of harvesting for *Panthera leo* (African lion) as represented by the relationship between species vulnerability (biology and status) (0 = low vulnerability; 1 = high vulnerability) and the management system to which the species is subjected (management, control, monitoring, 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.

<b>Biological characteristics</b>		
<b>1. Life history:</b> What is the species' life history?	High reproductive rate, long-lived	1
	High reproductive rate, short-lived	2
	<b>Low reproductive rate, long-lived</b>	<b>3</b>
	Low reproductive rate, short-lived	4
	Uncertain	5
<p><i>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 &amp; Pusey 1987). In general, there is high cub survival with &gt;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.</i></p>		
<b>2. Ecological adaptability:</b> To what extent is the species adaptable (habitat, diet, environmental tolerance etc.)?	Extreme generalist	1
	<b>Generalist</b>	<b>2</b>
	Specialist	3
	Extreme specialist	4
	Uncertain	5
<p><i>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.</i></p>		
<b>3. Dispersal efficiency:</b> How efficient is the species' dispersal mechanism at key life stages?	Very good	1
	Good	2
	Medium	3
	<b>Poor</b>	<b>4</b>
	Uncertain	5
<p><i>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 &amp; Packer 1987; Packer &amp; 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</i></p>		

*to the poor dispersal ability of lions in the South African context.*

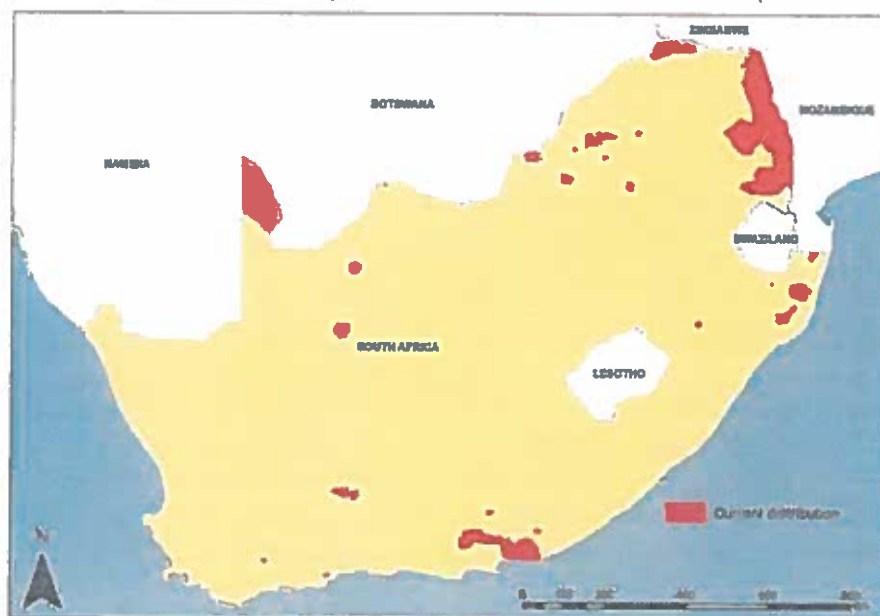
<b>4. Interaction with humans:</b> Is the species tolerant to human activity other than harvest?	No interaction	1
	Pest / Commensal	2
	Tolerant	3
	<b>Sensitive</b>	<b>4</b>
	Uncertain	5

*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**

<b>5. National distribution:</b> How is the species distributed nationally?	Widespread, contiguous in country	1
	Widespread, fragmented in country	2
	<b>Restricted and fragmented</b>	<b>3</b>
	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 20<sup>th</sup> 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 km<sup>2</sup>, with the largest proportion comprising a few large national or provincial protected areas (33 200 km<sup>2</sup>, ca. 80%), and with the remainder made up of 45 small private or state reserves (Figure 3) with a combined area of ca. 8500 km<sup>2</sup> (Miller et al. 2016b).*



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



<b>6. National abundance:</b> 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 Hluhluwe-iMfolozi Park (KwaZulu-Natal).

Reintroduction of lion into small reserves (including national parks, provincial protected areas, conservancies and private reserves of <1000 km<sup>2</sup> 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
<b>Total excl. small reserves</b>	<b>2990 (2376)</b>	<b>1554 (1286)</b>
Small reserves	500	225
<b>Total incl. small reserves</b>	<b>3490 (2876)</b>	<b>1779 (1511)</b>

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.*

<b>7. National population trend: What is the recent national population trend?</b>	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.*

<b>8. Quality of Information: What type of information is available to describe abundance and trend in the national population?</b>	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.*

<b>9. Major threats:</b> 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
<p><i>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 (<math>49.9 \pm 8.4 \text{ km}^2</math> compared to <math>843\text{-}5933 \text{ km}^2</math> 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).</i></p>		
<b>Harvest management</b>		
<b>10. Illegal off-take or trade:</b> How significant is the national problem of illegal or unmanaged off-take or trade?	None	1
	Small	2
	Medium	3
	Large	4
	Uncertain	5
<p><i>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 Transfrontier Park boundaries have been persecuted for decades (Mills et al. 1978; Van Vuuren, Hermann &amp; Funston 2005; Funston 2011).</i></p>		
<b>11. Management history:</b> 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, Hermann & 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).

<b>12. Management plan or equivalent:</b> Is there a management plan related to the harvest of the species?	<b>Approved and co-ordinated local and national management plans</b>	<b>1</b>
	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).

<b>13. Aim of harvest regime in management planning: What is harvest aiming to achieve?</b>	Generate conservation benefit	1
	Population management/control	2
	Maximize economic yield	3
	Opportunistic, unselective harvest, or none	4
	Uncertain	5
<i>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 &amp; Hofmeyr 2014; Miller et al. 2015).</i>		
<b>14. Quotas: Is the harvest based on a system of quotas?</b>	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
<i>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.</i>		
<b>Control of harvest</b>		
<b>15. Harvesting in Protected Areas: What percentage of the legal national harvest occurs in State-controlled Protected Areas?</b>	High	1
	Medium	2
	Low	3
	None	4
	Uncertain	5
<i>Hunting of lion is not allowed in national parks, which collectively represents the majority of the wild population (&gt;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 (&lt;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.</i>		
<b>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?</b>	High	1
	Medium	2
	Low	3
	None	4
	Uncertain	5
<i>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-</i>		



*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.*

<b>17. Harvesting in areas with open access:</b> What percentage of the legal national harvest occurs in areas where there is no strong local control, giving <i>de facto</i> or actual open access?	<b>None</b>	<b>1</b>
	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.*

<b>18. Confidence in harvest management:</b> 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**

<b>19. Methods used to monitor the harvest:</b> What is the principal method used to monitor the effects of the harvest?	Direct population estimates	1
	<b>Quantitative indices</b>	<b>2</b>
	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.

<b>20. Confidence in harvest monitoring:</b> 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

<b>21. Utilization compared to other threats:</b> 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.*

<b>22. Incentives for species conservation:</b> 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.*

<b>23. Incentives for habitat conservation:</b> At the national level, how much habitat conservation benefit is derived from harvesting?	High	1
	Medium	2
	Low	3
	None	4
	Uncertain	5
<i>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.</i>		
<b>Protection from harvest</b>		
<b>24. Proportion strictly protected:</b> 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
<i>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 (&gt;80% of the total lion population). The scoring is based on the population size and not on the range of the species.</i>		
<b>25. Effectiveness of strict protection measures:</b> 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
<i>The national and provincial permitting systems are effective.</i>		
<b>26. Regulation of harvest effort:</b> 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
<i>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).</i>		

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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



In Reply Refer To:  
FWS/AIA/DMA/PRT-83426C

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 17<sup>th</sup> 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 documents 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<sup>2</sup>), 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 Mokheba 2014). According to Crowley and Mokheba (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<sup>2</sup> to be a sustainable offtake of lions. The BMP (pg. 29) has established more restrictive limits for areas of less than 1000 km<sup>2</sup> to not exceed 0.5 lions/1000 km<sup>2</sup>.

*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 17<sup>th</sup> 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 development. 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 these 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 6/4/18*  
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**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 Cogliandro*  
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).



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

OMB No. 1018-0164  
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

JAN 9 2018

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

Type of Activity:  
**Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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 <b>SCHLIDT</b>	1.b. First name <b>CYNTHIA</b>	1.c. Middle name/initial <b>(b) (6)</b>	1.d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Occupation <b>(b) (6)</b>		
4. Affiliation/ Doing business as (see instructions) <b>(b) (6)</b>			
5.a. Telephone number <b>(b) (6)</b>	5.b. Alternate telephone number <b>(b) (6)</b>	5.c. Fax number <b>(b) (6)</b>	5.d. E-mail address <b>(b) (6)</b>

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
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>(b) (6)</b>			
1.b. City <b>Casper</b>	1.c. State <b>WY</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. Country/Province <b>USA</b>
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) <b>(b) (6)</b>			
2.b. City <b>Casper</b>	2.c. State <b>WY</b>	2.d. Zip code/Postal code <b>(b) (6)</b>	2.e. Country <b>USA</b>

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____	
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. <b>Cynthia Schlidt</b> Signature of applicant/person responsible for permit (No photocopied or stamped signatures)	
Date of signature (mm/dd/yyyy) <b>08/6/2017</b>	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity:        (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity:        (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:

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

Zimbabwe, Dande North Area 1, Ward 2 - Nearest town: Angwa Bridge  
Province: Mashonaland Central

- b. Date wildlife was hunted:

07/10/2017

- 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

- 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]:

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 appear on the face of the export permit].

Name: Business

Name: Address:

Address:

City:

State/Province:

Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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, I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: \_\_\_\_\_

(b)  
(6) Schlicht

Date: 8-7-2017

*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 government to conduct your propose activity. While the Service will attempt to assist where possible, 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 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):
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.







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

OMB No. 1018-0164  
Expires 11/30/2016

**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 of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

JAN 10 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 <b>ZALES</b>	1.b. First name <b>WILLIAM</b>	1.c. Middle name or initial [REDACTED]	1.d. Suffix [REDACTED]
2. Date of birth (mm/dd/yyyy) [REDACTED]	3. Occupation [REDACTED]	4. Affiliation/ Doing business as (see instructions) [REDACTED]	
5.a. Telephone number [REDACTED]	5.b. Alternate telephone number [REDACTED]	5.c. Fax number [REDACTED]	5.d. E-mail address [REDACTED]

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution		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) [REDACTED]			
1.b. City <b>VESTAVIA</b>	1.c. State <b>AL</b>	1.d. Zip code/Postal code: [REDACTED]	1.e. Country <b>USA</b>
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) [REDACTED]			
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. Country/Province
		2.f. Country	

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – <i>attach documentation of fee exempt status as outlined in instructions.</i> (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in <i>Title 50, Part 13 of the Code of Federal Regulations</i> and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature of applicant/person completing permit (No photocopied or stamped signatures)
Date of signature (mm/dd/yyyy) <b>01/05/2018</b>	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 01 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: N/A (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: N/A (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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:

City: Maravia  
Province: Tete  
Country: Mozambique

- b. Date wildlife is to be hunted:

07/09/2018 until 07/28/2018



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

Life size mount

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild:
- 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 document]:

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 appear on the face of the export permit].

Name: Business **EMIAC**  
Name: Address: **53 Maple Street**  
Address: **Pomona**  
City: **Kempton Park**  
State/Province: **Gauteng**  
Country, Postal Code: **South Africa**

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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 attached - highlighted in yellow

**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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:

*[Handwritten signature]*

Date: 01/05/2018

*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 government to conduct your proposed activity. While the Service will attempt to assist where possible, 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).

Will use: **Well Worldwide Energy Logistics, Inc.**  
**Houston, TX 77073**

9. 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):

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);

**WILLIAM** **SALES**

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.



william Zales &lt;[REDACTED]&gt;

**Mozambique**

2 messages

**Divan Labuschagne** <[REDACTED]>

Mon, Dec 4, 2017 at 1:14 PM

To: William [REDACTED] Zales &lt;[REDACTED]&gt;

Hi Divan

Please see below the info you requested:

Company of the Concessionaire's details:

Name: Grant Taylor

Business Name: Tetensi Safaris Lda

Address: Chipera block, Tchuma Tchato

City: Maravia

Province: Tete

Country: Mozambique

EMIAC will ship the trophies out of Moz to SA and then from there to the final destination there details are available online

Grant Taylor

Address: 385 Rua Capitaio Queiros, Macuti, Beira, Mozambique

20% of all trophy fees are given to the local population as part of community development projects.

We are part of the Tchuma Tchato project in Zimbabwe which is essentially exactly the same as the CAMPFIRE Program in Zimbabwe.





3639 Pescadero Creek Rd.  
Pescadero, CA 94060

U.S. Fish and Wildlife Service  
DMA  
Branch of Permits, MS: 1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803

To Whom It May Concern:

Enclosed is the original permit # 17US18848C/9, issued to me last year to import a leopard from Zimbabwe, which I did not use; the hunt was unsuccessful.

The permit is valid only until 03/09/18. We will be going back to Zimbabwe to hunt April 2-14, 2018, outside the valid dates, so I am applying for another permit. You will find the application enclosed as well.

Because of the close proximity to our departure and the time it can take to process the permit, I am requesting, if possible, that I be contacted by phone or email if and when the permit is issued.

I am aware that I need the permit only for import, which would be after April; I would just like to know while on the hunt. My contact info:

Phone (b) (6)

Email (b) (6)

Thank you in advance for your time in processing this second permit.

Sincerely,

Hilary (b) (6) Goldschlager

enclosure (b) (6)





# CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

## IMPORT PERMIT

Page 1 of 1

1. Original Permit/Certificate No.  
**17US18848C/9**2. Valid  
**03/09/2018**

## 3. Permittee (name and address, country)

HILARY (b) (6) GOLDSCHLAGER

(b) (6)  
HILLSBOROUGH, CA (b) (6)  
U.S.A.Original, Unused  
Permit Returned

## 4. Consignor (name and address, country)

PRO SAFARIS AFRICA  
20 HADDON AVE.  
KHUMALO, BULAWAYO  
ZIMBABWE

## 5. Special Conditions

MUST COMPLY WITH ATTACHED GENERAL PERMIT CONDITIONS.

SPECIMEN MAY NOT BE SOLD OR TRANSFERRED FOR ANY FINANCIAL REMUNERATION.

U.S. THREATENED SPECIES [50 CFR 17.40(f)]

MUST IMPORT THROUGH A DESIGNATED PORT LISTED IN CONDITION 10. PERMITTEE MAY ONLY IMPORT TWO LEOPARD TROPHIES PER CALENDAR YEAR.

EACH LEOPARD SKIN MUST HAVE SELF-LOCKING TAG ATTACHED TO IT WHICH INDICATES THE STATE OF EXPORT, THE NUMBER OF THE SPECIMEN IN RELATION TO THE ANNUAL QUOTA AND THE CALENDAR YEAR TO WHICH THE QUOTA APPLIES. THE EXPORT PERMIT (OR RE-EXPORT CERTIFICATE) MUST CONTAIN THE TAGGING INFORMATION AS OUTLINED ABOVE.

TROPHY MUST HAVE BEEN TAKEN DURING 2017 HUNTING SEASON.

*-May not be used for commercial purposes. For live animals, only valid if the transport conditions comply with the CITES Guidelines for Transport of Live Animals or, in the case of air transport, with IATA Live Animals Regulations.*

## 5a. Purpose of Transaction

H

## 6. U.S. Management Authority

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 22041-3803U.S. CITES  
Management Authority

03/10/2017

Issuing Date

United States Management Authority

AUTHORITY: Endangered Species Act of 1973 (16 USC 1531 et. seq.)

## 7/8. Common Name and Scientific name (genus and species) of Animal or Plant

## 9. Description of Part or Derivative, including identifying marks or numbers (age/sex if live)

## 10. Appendix No. and Source

## A. Common Name

LEOPARD

Scientific Name  
PANTHERA  
PARDUS

9. IMPORT PERSONAL SPORT HUNTED TROPHY (shipment may contain bones, claws, hide, skull, teeth, or any taxidermied part, as well as worked, manufactured, or handicraft items such as curios or jewelry, that must accompany raw or tanned parts.)

10. 1 W

11. Quantity (including units)  
1 NO12. Country of Origin  
ZIMBABWE

## B. Common Name

Scientific Name

9.

10.

11. Quantity (including units)

12. Country of Origin

## C. Common Name

Scientific Name

9.

10.

11. Quantity (including units)

12. Country of Origin

## D. Common Name

Scientific Name

9.

10.

11. Quantity (including units)

12. Country of Origin

## E. Common Name

Scientific Name

9.

10.

11. Quantity (including units)

12. Country of Origin





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

RCVD JAN 16 2018

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: 1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

**Type of Activity:**  
Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros

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 <b>GOLDSCHLAGER</b>	1.b. First name <b>HILARY</b>	1.c. (b) (6)	1.d. Suffix
2. (b) (6)		3. Affiliation/Doing business as (see instructions)	
4. (b) (6)		5.c. Fax number	5.d. (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 <b>Pescadero</b>	1.c. State <b>CA</b>	1.d. Zip code/Postal code (b) (6)	1.e. (b) (6)	1.f. Country <b>USA</b>	
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)					
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country	

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: <b>174518848C/9</b> No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter 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 understanding that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <b>09262017</b> Signature (in blue ink) of applicant or person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)	

Please continue to next page

**IMPORT OF SPORT-HUNTED TROPHIES OF AFRICAN LION, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**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 were 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:** The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

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:

Save Valley Conservancy, Zimbabwe

- b. Date wildlife is to be hunted:

April 2-14, 2018

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

pelt, skull, claws, teeth

3. IF THE ANIMAL IS DEAD, please enter the following:

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

- b. Date wildlife was hunted:

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 document]:

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 appear on the face of the export permit].

Name: PRO SAFARIS AFRICA 40 NORMAN CROOKS  
Business Name:  
Address: 20 Haddon Ave  
Address:  
City: Khumalo  
State/Province: Bulawayo, Zimbabwe  
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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: [Signature] Date: 09262017

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

8. All international shipments must be through a designated port. A list of designated ports (where an inspection 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 port code 5309

9. 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):

same as pg. 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):

Hilary Goldschlager

(b) (6)

(b) (6)

12. Disqualification [redacted], 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.







**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: N/A (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: N/A (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

N/A

3. IF THE ANIMAL IS DEAD, please enter the following:

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

Lusaka, Zambia

- b. Date wildlife was hunted: July 27 2017 - August 6 2017

- 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 of leopard

- 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]:

Zega Limited  
Lusaka Airport  
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 appear on the face of the export permit].

Name: Business Zega Limited  
Name: Address: Lusaka Airport  
Address: Kenneth Kaunda International Airport  
City: P.O. Box 37287  
State/Province: Lusaka  
Country, Postal Code: Zambia

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: Randy (b) (6) Romanowski Date: Jan 11 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.*

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).

Chicago, IL  
10600 Higgins Rd. Suite 200  
Rosemont, Illinois 60018

9. 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):

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):

Randy (b) (6) Romanowski (b) (6)  
(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.







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

OMB No 1018-0164  
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form **RCVD JAN 24 2018**

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

Type of Activity:  
Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros

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 Gully	1 b. First name Rhonda	1 c. Middle name or initial (b) (6)	1 d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Occupation	4. Affiliation/Doing business as (see instructions) N/A	
5 a. Telephone number (b) (6)	5 b. Alternate telephone number	5 c. Fax number	5 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) N/A	
2. Tax identification no N/A		3. Description of business, agency, Tribe, or institution N/A	
4 a. Principal officer Last name N/A	4 b. Principal officer First name N/A	4 c. Principal officer Middle name/initial N/A	4 d. Suffix N/A
5. Principal officer title N/A		6. Primary contact name N/A	
7 a. Business telephone number N/A	7 b. Alternate telephone number N/A	7 c. Business fax number N/A	7 d. Business e-mail address N/A

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 Arlington	1 c. State Texas	1 d. Zip code/Postal code (b) (6)	1 e. County/Province	1 f. Country USA
2 a. Mailing Address (include if different than physical address, include name of contact person if applicable) Same 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 <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and (b) (6) that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Signature of applicant/person  permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) 1/16/2018

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: N/A (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

N/A

3. **IF THE ANIMAL IS DEAD**, please enter the following:

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

- b. Date wildlife was hunted: Country-Namibia, Area-Omaheke, GIS-22°30'16"S 18°16'35"E, Ranch Weshof # 585, Nearest City Witvlei Date hunted: 07/08/2017

**PERMIT NUMBER: 172646**

- 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 document]:

Farm Weshof # 585, Witvlei, Namibia

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 appear on the face of the export permit].

Name: Business William Albert Pretorius (Professional Hunter Name Appearing on Namibian Hunting Permit)  
Name: Address: Africa Awaits Hunting Safaris , P O Box 830 Gobais, Namibia  
Address: Farm Wendelstein no. 1026, Gobais, Namibia  
City: Gobais  
State/Province: Omaheke  
Country, Postal Code: Namibia, 9000

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported (b) (6) 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.*

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 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):

Same

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):

Pat Latham 817-371-4340 [latham@highmountainhunts.com](mailto:latham@highmountainhunts.com)

Roy Gully (b) (6) (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.







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

OMB No. 1018-0164  
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

RECEIVED JAN 31 2018

LB

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

Type of Activity:  
Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros

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 FOWLER	1.b. First name JEFFREY	1.c. Middle name/initial (b) (6)	1.d. Suffix
2.a. Date of birth (mm/dd/yyyy) (b) (6)	3. Occupation	4. Affiliation/ Doing business as (see instructions)	
5.a. Telephone number (b) (6)	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address MATT@GENUSLOGISITCS.COM

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 NEWARK	1.c. State OH	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province	1.f. Country 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	

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

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild:
- b. Date wildlife was hunted: 10/15/2017
- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):  
FULL MOUNT, SKULL  
SKIN
- 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]:  
TSISEB CONSERVANCY NAMIBIA

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 appear on the face of the export permit].

Name: Business PJ DE LANGE  
Name: Address: PO BOX 5091  
Address: AUSSPANNPLATZ  
City: WINDHOEK  
State/Province: NAMIBIA  
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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: 12/1/18

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. I understand that I may only import two African elephant trophies in one 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.*

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 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):

GENUS LOGISITCS 161-15 ROCKAWAY BLVD, JAMAICA, 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):  
MATT MAYERS 718-790-0216

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.



## Genus Logistics Inc.

16115 Rockaway Blvd STE 205 Jamaica NY 11434

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. The U.S. Customs Service will then deliver the importer's check or bank draft to Customs. The new rule also requires brokers to provide written notification to their clients 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 broker is unable to pay 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 1, 2000.

BELOW IS A POWER OF ATTORNEY FORM WHICH IS REQUIRED BY U.S. CUSTOMS, TO ALLOW US TO TRANSACT U.S. CUSTOMS CLEARANCE OF YOUR IMPORTS.

Department of the Treasury

Individual U.S. Customs Service Individual IRS / SS #

(b) (6)

☒ Individual

☐ Partnership

Partnership 141.32. C.R.

☐ Corporation

☐ Sole Proprietorship

### CUSTOMS POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS: That, JEFFREY (b) (6) POWELL (Full Name of person, partnership, corporation, or sole proprietorship (identify)) a corporation doing business under the laws of the State of, \_\_\_\_\_ or a \_\_\_\_\_ doing business in \_\_\_\_\_ residing at (b) (6) NEWARK, OHIO (b) (6) having an office and place of business at \_\_\_\_\_ hereby

constitutes and appoints each of the following persons \_\_\_\_\_ Genus Logistics Inc. \_\_\_\_\_

may act through any of its offices or any employees with Power of Attorney on file with this license and broker as required by 19 CFR 111.36(a) to sign, seal, and deliver for and on the behalf of the grantor any and all documents, statements, schedules, certificates, and delivery abstracts, and any and all bonds which may be required by law or regulation in connection with such merchandise; to receive any merchandise deliverable to said grantor; to receive and deliver 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 record; 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 transit 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, unloading 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, unloading, 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, in 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 full power and authority to do anything whatever requisite and necessary to be done in the premises as fully as said grantor could if personally 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 have 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 power of attorney is a partnership, the said power shall in no case have any force or effect after the expiration of 2 years from the date of its execution, unless renewed. Pursuant to 19 CFR 111.36(a), election is made waiving the right to receive invoices, supporting documents and correspondence from the broker who is directed to forward all documents and inquiries concerning our imports to their customs brokerage services on our behalf. We understand that Genus Logistics Inc., for duties, and services performed on our behalf, it is understood that the broker is not responsible for the payment of duties.

IN WITNESS WHERE OF, the said (Print name) JEFFREY (b) (6) POWELL

has caused these presents (b) (6) and signed:

(Signature) (b) (6)

(Capacity) \_\_\_\_\_ (Date) JANUARY 24, 2018

WITNESS (b) (6)

**MINISTRY OF ENVIRONMENT AND TOURISM**

Directorate Natural Resources Management  
Private Bag 13306  
Windhoek, Namibia  
Enquiries: Chief Warden,  
Permit Office



Tel: +264-61-284 2111  
Fax: +264-61-258 861

PERMIT No.:

175100

VALID FROM:

10.10.17

VALID TO:

23.10.17

RECEIPT No.:

**PERMIT TO HUNT FOR TROPHIES**

Permission is hereby granted in terms of the Nature Conservation Ordinance 1975 (Ord. 4 of 1975)

Name of Trophy Hunter:

J. (b) (6) Fowler

Residential Address:

Country:

LISA

To hunt the specified number of game for the sake of trophies:

Indicates species listed on CITES  
Appendix I or II

SPECIES: COMMON NAME	Number
Buffalo	
I Crocodile	
Dik-dik	
Eland	
II Elephant	
Giraffe	
Grey Duiker	
II Hippopotamus	
Impala, Black-faced	
Impala, common	
Klipspringer	
Kudu	
II Lechwe	
Oryx (Gemsbok)	
Ostrich	
Red hartebeest	
Reedbuck	
I Rhinoceros, black	
I Rhinoceros, white	
Roan	
Sable	
Springbok	

SPECIES: COMMON NAME	Number
<del>Steenbok</del>	
Warthog	
Waterbuck	
Wildebeest, blue	
Zebra, Burchell's	
II Zebra, Hartman's mountain	
Blesbok	
Wildebeest, black	
I Cheetah	
I Leopard (Male)	IX
II Lion	
Other	
Subject to the attached predator trophy hunting conditions	
*Nuthy nearest MET 7 days prior hunt	

on the following farms / hunting concessions:

Tiseb Conservancy

Guided by (name of guides):

P.J. de Lange

**MINISTRY OF ENVIRONMENT & TOURISM**

R. Hebes

ISSUING OFFICER (NAME &amp; SIGNATURE)

UNDER THE AUTHORITY OF THE MINISTER,  
POHAMBIA SHIFETA IN TERMS OF SECTION  
78 (L) OF THE NATURE CONSERVATION  
ORDINANCE, 1975 (ORDINANCE NO. 4  
OF 1975) AS AMENDED.

Official MET date stamp

MINISTRY OF ENVIRONMENT AND TOURISM REPUBLIC OF NAMIBIA
2017 -10- 10
PERMIT OFFICE Private Bag 13306, Windhoek Tel: 061 258 861

**IMPORTANT: This permit is not valid if altered in anyway**

**The following certificate must be completed immediately after each animal that has been hunted (please print)**

[illegible]

\*L= Left, R=Right, Horn, B=Base, RW=Rowland Ward

No trophy hunter may hunt unless accompanied by a professional hunter, master hunting guide or hunting guide.

This permit must be kept on the person of the permit holder at all times while hunting.

Only guide(s) as specified on the permit may conduct the hunt.





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

OMB No. 1018-0164  
Expires 11/30/2016

RCVD FEB 02 2018

LB

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 of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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 <b>Bass</b>	1 b. First name <b>Robert</b>	1 c. Middle name or initial <b>(b) (6)</b>	1 d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Occupation		
4. Affiliation/ Doing business as (see instructions)			
5 a. Telephone number <b>(b) (6)</b>	5 b. Alternate telephone number	5 c. Fax number	5 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		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>(b) (6)</b>			
1 b. City <b>Myrtle Beach</b>	1 c. State <b>SC</b>	1 d. Zip code/Postal code <b>(b) (6)</b>	1 e. County/Province <b>USA</b>
2 a. Mailing Address (include if different than physical address, include name of contact person if applicable) <b>(b) (6)</b>			
2 b. City <b>Myrtle Beach</b>	2 c. State <b>SC</b>	2 d. Zip code/Postal code <b>(b) (6)</b>	2 e. County/Province <b>USA</b>
D. All applicants MUST complete			
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))			
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: <b>13US07816B/9</b> No <input type="checkbox"/>			
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.			
Signature of applicant/person responsible for permit (No photocopied or stamped signatures) 		Date of signature (mm/dd/yyyy) <b>01/23/2018</b>	

Please continue to next page



**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 02 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild:
- b. Date wildlife was hunted: **Chunya Msami Open area, SW Tanzania, S0727134 E0325856.6 and Piti open area, SW Tanzania, S071365.9 E0324356.6. 8/13/17 and 8/20/17**
- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):
- Skins, skulls, 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 document]:

**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 appear on the face of the export permit].

Name: Business **McCallum Safaris Affiliates, Tanzania (Old Nyika Safaris Ltd., Safari Royal Holdings Ltd.)**  
Name: Address: **P.O. Box 4**  
Address: **Arusha**  
City: **Arusha**  
State/Province: **Tanzania**  
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:  Date: 1/23/18

*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.*

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).

*New York, NY USA*

9. 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):

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):

(b) (6) Bass (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.



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

**BOARD OF DIRECTORS:**  
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January 16, 2018

U.S. Fish and Wildlife Service  
Division of Management Authority (DMA)  
Branch of Permits, MS: 1A  
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<sup>2</sup>. 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](mailto:jjj@conservationforce.org)  
[www.conservationforce.org](http://www.conservationforce.org)




**NOTICE OF REPRESENTATION**

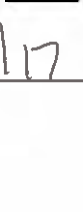
This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for one permit to import a lawfully hunted African lion trophy.

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](mailto:cf@conservationforce.org)

Signed: Keirigan  Waibee

Name: Keirigan  Waibee

Date: 12/27/17



Department of the Interior  
U.S. Fish and Wildlife Service FEB - 2 2013

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: 1A  
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 WAIBEL	1.b. First name KERRIGAN	1.c. Middle name or initial R.	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation	
5. Affiliation/ Doing business as (see instructions)			
6.a. Telephone number (b) (6)	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address

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 POWELL BUTTE	1.c. State OR	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province
1.f. Country USA			
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)			
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province
2.f. Country			

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: UN SURE OF PERMIT # No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Heran (b) (6) Hamlen 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)

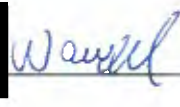
6. If you are a broker or taxidermist applying on behalf of a foreign national, provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

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:  (b) (6)  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 km<sup>2</sup> and provides habitat for a range of species including buffalo, lion, leopard, hippo, waterbuck, defassa, kudu, roan, eland, reedbuck, oribi, impala, bushbuck, hycna, 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 activities. 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:

<b>Item</b>	<b>Spend (USD)</b>	<b>Notes</b>
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	
<b>TOTAL</b>	<b>2,750.00</b>	

**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.

#### Enhancement Report

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 or 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

The Zambia wildlife Act  
(Act No 12 Of 1998)

The Zambia Wildlife (Licences and fees) Regulations, 2007

(Regulation 3 (2))

# Chilanga

06/07/2017

(b) (6)

KERRIGAN

WAIBEL

NRC/Passport No

Tel/Fax.

Mangemba Safari

Mangemba Safari

Date of incorporation

Box 30084 LA

[0](#) [1](#) [2](#) [3](#) [4](#) [5](#) [6](#) [7](#) [8](#) [9](#) [A](#) [B](#) [C](#) [D](#) [E](#) [F](#) [G](#) [H](#) [I](#) [J](#) [K](#) [L](#) [M](#) [N](#) [O](#) [P](#) [Q](#) [R](#) [S](#) [T](#) [U](#) [V](#) [W](#) [X](#) [Y](#) [Z](#)

...Caibre of Firearm(s)

**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 following 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	A	M	Mumbar Wet	2017	
/					/
/					/
/					/
/					/
/					/
/					/
<b>Note:</b>					
Original copy to be retained by the Licencee					
Duplicate copy to be forwarded to the Director - General or to his agent.					
Triplicate to be returned in the book.					
				Total Animals Fees	
				Concession Fees	
				Grand TOTAL	

**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 1207

  
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)

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

DETAILS OF CLIENT

Full Name: KERRIGAN WAIBEL NRC/Passport No. (b) (6)

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	Foreign currency value charged to client
09/07/17	PUKU / M	01	—	S15°09'53.5 E25°58'52.3	✓	Lic 18813
09/07/17	IMPALA / M	01	—	S15°09'53.4 E25°58'52.3	✓	Lic 18814
11/07/17	WATERBUCK / M	01	—	S15°04'18.5 E26°00'4.4	✓	Lic 18811
14/07/17	LION / M	01	—	S15°04'01.5 E26°08'36.9	✓	Lic 18808

DETAILS OF TROPHY MEASUREMENT

Species	Length of skin	Length of Tusk	Av. Length 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		
Amount of foreign currency paid by the Safari 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 [Signature]  
Professional Hunter [Signature]

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

Wildlife Police Officer. [Signature]

LEOPARD AND LION HUNT RETURN FORM									
Each animal hunted should be accompanied by a permit. All data collected and all measurements should be in metric units.									
Name of Professional Hunter <u>MARK A SWANEPOL</u>					Monitoring Scout			Rank:	
DETAILS OF CLIENT									
Name of client <u>KERRIGAN (b) (6) WAIREL</u>					Nationality <u>USA</u>				
Country of Residence <u>USA</u>									
Address <u>USA</u>									
GMA permit No. <u>23746</u>					Non Resident Hunting Licence No <u>18808</u>				
DETAILS OF HUNT AND TROPHY MEASUREMENTS									
Name of GMA <u>MUMBWA WEST</u>			Hunting period						
Name of Hunting Block <u>MUMBWA WEST</u>			From (Date) <u>08-07-17</u>			To (Date) <u>31-07-17</u>			
Date Killed or wounded	Species	Killed or Wounded	Sex (tick)		GPS Location (in decimal degrees - hddd dddd )				
					Latitude		Longitude		
<u>14-07-17</u>	<u>LION</u>	<u>KILLED</u>	Female	Male <input checked="" type="checkbox"/>	<u>S15°04'07.5</u>		<u>E026°08'36.9</u>		
Date measured (DDMMYY)	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)		
<u>24-07-17</u>	<u>275 cm</u>	<u>95 cm</u>	<u>187.5 cm</u>		<u>39.375 cm</u>		<u>23.75 cm</u>		
PHOTOS & SAMPLES (tick in space provided for photos & samples taken)									
1. Whole body from the side*	<input checked="" type="checkbox"/>	7. Teeth before cleaning (front & side)*	<input checked="" type="checkbox"/>	12. Ridges on back of Lower canines	<input type="checkbox"/>				
2. Mane from the top*	<input checked="" type="checkbox"/>	8. Teeth after cleaning (front & side)	<input checked="" type="checkbox"/>	13. Tissue samples taken	<input type="checkbox"/>				
3. Face & head from the top*	<input checked="" type="checkbox"/>	9. Lower Jaw from side	<input checked="" type="checkbox"/>	14. Premolar extracted	<input type="checkbox"/>				
4. Face & Chest*	<input checked="" type="checkbox"/>	10. Ridges on back of Upper Canines	<input type="checkbox"/>		<input type="checkbox"/>				
5. Nose*	<input checked="" type="checkbox"/>	11. Whisker spots (Right & Left)	<input checked="" type="checkbox"/>		<input type="checkbox"/>				
* 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: <u>[Signature]</u>			





Vargas, Darcy &lt;darcy\_vargas@fws.gov&gt;

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## 75473C / Lion Trophy Import

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Vargas, Darcy &lt;darcy\_vargas@fws.gov&gt;

Thu, Jun 7, 2018 at 5:04 PM

To: "Regina A. Lennox" &lt;regina.lennox@conservationforce.org&gt;, jjw-no &lt;jjw-no@att.net&gt;

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 13.11(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](http://www.fws.gov)  
[www.cites.org](http://www.cites.org)

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Vargas, Darcy &lt;darcy\_vargas@fws.gov&gt;

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## 75473C / Lion Trophy Import

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Vargas, Darcy &lt;darcy\_vargas@fws.gov&gt;

Thu, Jun 7, 2018 at 4:36 PM

To: "Regina A. Lennox" &lt;regina.lennox@conservationforce.org&gt;, jjw-no &lt;jjw-no@att.net&gt;

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 13.11(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  
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[www.cites.org](http://www.cites.org)

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# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
International Affairs  
5275 Leesburg Pike, MS: 1A  
Falls Church, VA 22041-3803



June 8, 2018

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

Enhancement Finding  
Applicant: Kerrigan (b) (6) Waibel (PRT-75473C)

Kerrigan (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 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 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 17<sup>th</sup> 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<sup>2</sup> of wildlife area (average 189 km<sup>2</sup> 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<sup>2</sup> (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<sup>2</sup> (approximately 10,000 km<sup>2</sup> 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<sup>2</sup> (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 of 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 unsustainable 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 and 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 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 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 undertaken 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 (b) (6) Waibel.**

  
Darcy Vargas, Biologist  
Branch of Permits  
Division of Management Authority

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

## REFERENCES:

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**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 Cagliano*  
CHIEF, BRANCH OF PERMITS, DMA

**Permittee:**

KERRIGAN (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).



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 MAY 02 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 of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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 <b>Ford</b>	1.b. First name <b>Jerry</b>	1.c. Middle name or initial <b>(b) (6)</b>	1.d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Social Security No. <b>(b) (6)</b>	4. Occupation <b>N/A</b>	5. Business as (see instructions)
6.a. Business telephone number <b>(b) (6)</b>	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		1.b. Doing business as (dba)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name <b>N/A</b>	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. Physical Address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) <b>(b) (6)</b>			
1.b. City <b>Hartsville</b>	1.c. State <b>Tenn</b>	1.e. Country <b>USA</b>	
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) <b>P.O. Box 237</b>			
2.b. City <b>Hartsville</b>	2.c. State <b>Tenn</b>	2.d. Zip code/Postal code <b>(b) (6)</b>	2.f. Country <b>USA</b>

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: <b>211165</b> No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <b>Jerry Ford</b> Signature (in blue ink) responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) <b>4-27-2018</b>	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**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 were 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:** The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: N/A (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: N/A (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

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, horns, tusks).

N/A

3. **IF THE ANIMAL IS DEAD**, please enter the following:

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

Windhoek, NAMIBIA

- b. Date wildlife was hunted:

10-16-20-2017

- 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

- 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]:

The Yellow Shark Holdings (Pty) Ltd  
P.O. Box 81413  
Windhoek, Namibia

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 appear on the face of the export permit].

Name: Titus Schmidt  
Business Name: The Yellow Shark Holdings (Pt) Ltd  
Address: P.O. Box, 81413  
Address: Olympia  
City: Windhoek  
State/Province: Republic of Namibia  
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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: \_\_\_\_\_

(b) (6)  
[Redacted Signature]

Date: 4-27-2018

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.



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).

Atlanta

9. 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):

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 (b) (6) have question (b) (6)

Jerry

Ford!

(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.





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-1A  
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 <b>Hadden</b>	1.b. First name <b>David</b>	1.c. Middle name (b) (6)	1.d. Suffix	
2. (b) (6)		5. Affiliation/ Doing business as (see instructions)		
3. Telephone number (b) (6)	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. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)				
1.b. City <b>Corpus Christi</b>	1.c. State <b>TX</b>	1.d. Zip code/Postal code (b) (6)	1.f. Country <b>United States</b>	
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  <b>[Signature]</b> Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures)	
<b>1-19-2018</b> 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, RSA 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  
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:  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)

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.





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

OMB No. 1018-0164  
Expires 11/30/2016

**Federal Fish and Wildlife Permit Application Form**

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

**Type of Activity:**  
**Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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 <b>Bickler</b>	1.b. First name <b>James</b>	1.c. Middle name/initial <b>(b) (6)</b>	1.d. Suffix
2. (b) (6)	4. Affiliation/ Doing business as (see instructions) <b>N/A</b>		
3. (b) (6)	5. (b) (6)	6. (b) (6)	7. (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. (b) (6)			
1.b. City <b>Bend</b>	1.c. State <b>OR</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.f. Country <b>USA</b>
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)			
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province
2.f. Country			

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: <b>last in house fire</b> No <input type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter 1 of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <b>(b) (6)</b> Signature of applicant or person responsible for permit (No photocopied or stamped signatures) <b>2-9-2018</b> Date of signature (mm/dd/yyyy)

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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: Grant Taylor

Mashambanzou Safaris

Rua do Aeroporto - Terminal de Cargas

Beina mozambique

b. Date wildlife is to be hunted:

June 1, 2018 - June 14, 2018

Hunting Area:

mauevia district

Tete Province

Mozambique

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

Skin, Skull, Claws

3. **IF THE ANIMAL IS DEAD**, please enter the following:

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

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 document]:

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 appear on the face of the export permit].

Name: Business Grant Taylor Mashambanzou Satoris

Name: Address:

Address: Rua do Aeroporto - Terminal de Cargas

City: Beira

State/Province: Sofala Province

Country, Postal Code: Mozambique

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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)

N/A

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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:

James Bickler (b) (6)

Date:

2-9-2018

*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.*

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).

Portland OR

9. 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):

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. N/A

☐ 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 Bickler

(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.

To whom it may concern,

I hunted the Safala Province, Mozambique in 2016 with the same outfitter on my present application, being Mashambanzore Safaris. I had a U.S. Fish and Wildlife permit.

I was not successful in procuring a leopard and the permit was later lost in a house fire. I am re-applying for 2018 hunting with the same company.

As I do not have the old permit I called U.S. F&W and spoke to a fellow who told me to attach a letter explaining my dilemma and there should be no problem.

Please call or email if you need any further info, input etc.

Best Regards

James Bickler

James Bickler

Ph  
Email

(b) (6)





† 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.  
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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:

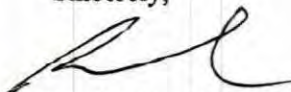
Enclosed please find the following:

- 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<sup>2</sup>. 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](mailto:jjj@conservationforce.org)  
[www.conservationforce.org](http://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](mailto:cf@conservationforce.org)

Signed: Charles Waibel (b) (6)  
Name: Charles Waibel (b) (6)  
Date: 12-27-17





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: 1A  
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 <b>WAIBEL</b>	1.b. First name <b>CHARLES</b>	1.c. Middle name or initial <b>(b) (6)</b>	1.d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Social Security No. <b>(b) (6)</b>	4. Occupation <b>(b) (6)</b>	5. Affiliation/ Doing business as (see instructions)
6.a. Telephone number <b>(b) (6)</b>	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 <b>N/A</b>		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 <i>[Signature]</i>		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>(b) (6)</b>			
1.b. City <b>POWELL BUTTE</b>	1.c. State <b>OR</b>	1.d. Zip code/Postal code: <b>(b) (6)</b>	1.e. County/Province <b>(b) (6)</b>
1.f. Country <b>USA</b>			
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)			
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province
2.f. Country			

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: <b>UN SURE OF #</b> No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. This statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <i>Charles Waibel</i> <i>[Signature]</i> Signature (in blue ink) of <b>(b) (6)</b> permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) <b>12-27-17</b>	

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) W. W. W. W. 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 km<sup>2</sup> 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 activities. 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	
<b>TOTAL</b>	<b>US\$9,000.00</b>	

#### **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 or 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.

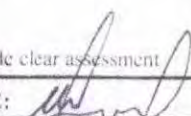
All Lion and Leopard hunts are studied and scrutinized on camera to determine their age and size before they are actually shot.

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

Signed: R. Nandwa

Operator Name: Baobab Safaris Limited

Title: Director

LEOPARD AND LION HUNT RETURN FORM											
(If 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. (b) (6) 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:		MUNYAMAZI / 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 - lddd.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	275 cm	92.5 cm	85 cm		37.6 cm			23 cm			
PHOTOS & SAMPLES (tick in space provided for photos & samples taken)											
1. Whole body from the side*		<input checked="" type="checkbox"/>		7. Teeth before cleaning (front & side)*		<input checked="" type="checkbox"/>		12. Ridges on back of Lower canines		<input checked="" type="checkbox"/>	
2. Mane from the top*		<input checked="" type="checkbox"/>		8. Teeth after cleaning (front & side)		<input checked="" type="checkbox"/>		13. Tissue samples taken		<input type="checkbox"/>	
3. Face & head from the top*		<input checked="" type="checkbox"/>		9. Lower Jaw from side		<input checked="" type="checkbox"/>		14. Premolar extracted		<input type="checkbox"/>	
4. Face & Chest*		<input checked="" type="checkbox"/>		10. Ridges on back of Upper Canines		<input checked="" type="checkbox"/>				<input type="checkbox"/>	
5. Nose*		<input checked="" type="checkbox"/>		11. Whisker spots (Right & Left)		<input checked="" type="checkbox"/>				<input type="checkbox"/>	
<p>*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</p>											
DATA RECEIVED BY:				DATE:				SIGNATURE: 			



# REPUBLIC OF ZAMBIA

The Zambia wildlife Act  
(Act No. 12 Of 1998)

LFZAWA Form 2

The Zambia Wildlife (Licences and fees) Regulations, 2007

21889

## 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)

Nationality: U.S.A Tel/Fax: \_\_\_\_\_

Address: \_\_\_\_\_

Full Name of Safari company: Barobab Saf

Company Cert. Incorporation No. (b) (6) Date of incorporation: \_\_\_\_\_

Postal Address: \_\_\_\_\_

Residential Address: \_\_\_\_\_

Firearm Licence/Tourist's Firearm import No.: \_\_\_\_\_ Calibre of Firearm(s): \_\_\_\_\_

Type of Hunt: \_\_\_\_\_ Hunting Block: \_\_\_\_\_

Ref 7362341

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 following 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	Nyampoko	2017	
			Imisungu		
Total Animals Fees					
Concession Fees					1
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



Date: 22/6/17

[Signature]  
Director General



12035

No. ....

## REPUBLIC OF ZAMBIA

The Zambia Wildlife Act  
(No. 12 of 1998)

Form ZAWA 14

The Zambia wildlife  
(Licences and fees) Regulations, 2003RECORD OF GAME OR PROTECTED ANIMALS KILLED OR WOUNDED UNDER NON-RESIDENT HUNTING LICENCE  
(Regulation 6)

## DETAILS OF PROFESSIONAL HUNTER

Full Name: MARK A. SWANGEPOEL NRC/Passport No: (b) (6)Safari Company on behalf of which the Professional hunter is submitting this return: BAOBAB SAFARIS

## DETAILS OF CLIENT

Full Name: BRADLEY (b) (6) WAIBEL NRC/Passport No: (b) (6)

Postal Address: (b) (6)

Non Resident Hunting Licence No: 23871 Date of issue: 22-06-17Name of Hunting block hunting was conducted MUNYAMADZI / NYAMPALA GMAHunting period: 28-06-17 to: 28-07-17

Date	Species/Sex	Number Killed	Number wounded	GPS Location	Trophy for Export		Foreing currency value charged to client
					Yes	No	
04/07/17	HIPPO/MALE COOKSONS	ONE	-	S12'6635.9 E032'09759V	✓		#21891
05/07/17	WILDERBEEST/MALE	ONE	-	S12'3110.1 E032'05477V	✓		#18189
09/07/17	LION/MALE	ONE	-	S12'3869.7 E032'0337.9V	✓		#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 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 &amp; conditions of a Non Resident Hunting Licence &amp; 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





# 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 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 17<sup>th</sup> 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<sup>2</sup> of wildlife area (average 189 km<sup>2</sup> 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<sup>2</sup> (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<sup>2</sup> (approximately 10,000 km<sup>2</sup> 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<sup>2</sup> (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 of 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 unsustainable 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 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 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 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 undertaken 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

 6/8/18  
\_\_\_\_\_  
Mary Coglianor, Chief  
Branch of Permits  
Division of Management Authority

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**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 Cogliano*  
CHIEF, BRANCH OF PERMITS, DMA

**Permittee:**

CHARLES (b) (6) WAIBEI  
(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).



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

OMB No 1018-0164  
Expires 11/30/2016

## 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 of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros

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 <u>Cater</u>	1.b. First name <u>Paul</u>	1.c. Middle name/initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation (Doing business as, partnership)	
(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
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. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)			
1.b. City <u>Katy</u>	1.c. State <u>Texas</u>	1.d. Zip code/Postal code (b) (6)	1.e. Country/Province <u>USA</u>
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) <u>N/A</u>			
2.b. City <u>N/A</u>	2.c. State <u>N/A</u>	2.d. Zip code/Postal code <u>N/A</u>	2.e. Country/Province <u>N/A</u>

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: <u>1545691588/9</u> No <input type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter 1 of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <u>(b) (6)</u> Signature of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) <u>02/06/2018</u>

Please continue to next page



**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: N/A (Import is limited to two per hunter per calendar year)  
**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: N/A (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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 Conservancy

b. Date wildlife is to be hunted:

06/19/2018 - 07/12/2018

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

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: *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 document]:

*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 appear on the face of the export permit].

Name: Business *Leon Duplessis Save's Safari*  
Name: Address: *Box CH381*  
Address: *Chisipite*  
City: *Harare*  
State/Province: *Zimbabwe*  
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: \_\_\_\_\_

(b)  
(6)  
P. [redacted] [signature]

Date: \_\_\_\_\_

02/06/2018

*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.*

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 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):

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.





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

OMB No. 1018-0091  
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: 1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104


**Type of Activity:**  
**Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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 <b>MORRIS</b>	1.b. First name <b>JAMES</b>	1.c. Middle name or initial <b>(b) (6)</b>	1.d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Social Security No <b>(b) (6)</b>	4. Occupation <b>(b) (6)</b>	5. Affiliation/ Doing business as (see instructions) <b>n/a</b>
6.a. Telephone number <b>(b) (6)</b>	6.b. Alternate telephone number <b>(b) (6)</b>	6.c. Fax number <b>(b) (6)</b>	6.d. E-mail address <b>(b) (6)</b>

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution <b>CONROE TAXIDERM, LP</b>		1.b. Doing business as (dba)	
2. Tax identification no <b>(b) (4)</b>		3. Description of business, agency, Tribe, or institution <b>TAXIDERM</b>	
4.a. Principal officer Last name <b>SIMPSON</b>	4.b. Principal officer First name <b>BARRET</b>	4.c. Principal officer Middle name/ initial <b>WAYNE</b>	4.d. Suffix
5. Principal officer title <b>GENERAL MANAGER</b>		6. Primary contact name <b>BEVERLY NICHOLS</b>	
7.a. Business telephone number <b>281-367-2745</b>	7.b. Alternate telephone number <b>n/a</b>	7.c. Business fax number <b>281-292-9565</b>	7.d. Business e-mail address <b>info@conroetaxidermy.com</b>

C. All applicants complete address information					
1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) <b>(b) (6)</b>					
1.b. City <b>MONTGOMERY</b>	1.c. State <b>TEXAS</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>	
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 <b>USA</b>	

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: <b>LE671441-0</b> No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter 1 of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures)	
Date of signature (mm/dd/yyyy) <b>07-Feb 2018</b>	

Please continue to next page



**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**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 were 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:** The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: <sup>1</sup> \_\_\_\_\_ (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

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, horns, tusks).  
N/A

3. **IF THE ANIMAL IS DEAD**, please enter the following:

a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: MULOBEZI GAME MGMT AREA OF ZAMBIA S16° 27' 14.2" E025° 27' 11.5"

b. Date wildlife was hunted:  
11-AUGUST 2017

- 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 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 document]:

4142/K 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 appear on the face of the export permit].

Name: Bangweulu Taxidermy Limited  
Business Name: 4142/K Chifwema Road  
Address: New Kasama, Lusaka  
Address: Zambia  
City:  
State/Province:  
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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: 6-7-Feb-2018

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. (b) (6)

Applicant's signature:  

Date: 2/7/2018

*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.*

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 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):

CONROE TAXIDERMY  
11845 CLARK LANE  
CONROE, TX 77385

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):

BEVERLY NICHOLS 281-367-2745  
info@conroetaxidermy.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.

## CUSTOMS POWER OF ATTORNEY

PLEASE ✓ APPROPRIATE BOX

<input checked="" type="checkbox"/> Individual	<input type="checkbox"/> Partnership	<input type="checkbox"/> Corporation	<input type="checkbox"/> Sole Proprietorship	<input type="checkbox"/> Limited Liability Company
--	--------------------------------------	--------------------------------------	--	--

KNOW ALL MEN BY THESE PRESENTS: That, James Morris (b) (6) doing business as (b) (6) under the laws of the State of Texas (Full name of individual, partnership, corporation, sole proprietorship, or limited liability company (identify))

residing or having a primary place of business at Montgomery, TX USA hereby constitutes and appoints CONROE TAXIDERM its officials, employees and/or specifically authorized agents, to act for and on its behalf as true and lawful agent and attorney of the grantor named for and in the name, place, and stead of said grantor from the date, in the United States ("territory"), either in writing electronically or by other authorized means, to;

Make, approve, sign, declare, or swear to any entry, withdrawal, declaration, certificate, bill of lading, carnet or any other documents required by law or regulation in correlation with the importation, transportation, or exportation of any merchandise in or through the Customs territory shipped or consigned by or to said grantor;

Execute any act or condition, which may be required by law or regulation in correlation with such merchandise deliverable to said grantor, to receive any merchandise;

Make approvals 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 Customs;

Sign, seal and deliver for and as the act of said grantor any bond required by law or regulation in correlation with the entry or withdrawal of imported merchandise or merchandise exported with or without benefit of drawback, or in any correlation 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 in correlation 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 correlation 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, approve and collect checks issued for Customs 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;

Generally transact Customs business, including filing 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,

Providing to said agent and attorney full power and authority to do anything necessary to be done in the premises as completely 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 of effect in the United States after the expiration 2 years from the dates of its execution);

Appointment as Forwarding Agent: Grantor authorizes the above grantee to act within the territory as lawful agent and sign or approve export documents (i.e., commercial invoices, bills of lading, insurance certificates, drafts and any other document) necessary for the completion of an export on grantors behalf as may be required under law and regulation in the territory and to appoint forwarding agents on grantor's behalf;

Grantor acknowledges receipt of CONROE TAXIDERM Terms and Conditions governing all transactions between the persons concerned. 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 James Morris (b) (6)

Caused these presents to be sealed and signed: Signature X James Morris (b) (6)

Capacity: self

Date: 01-Feb-2018

Witness (if required): \_\_\_\_\_







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

Federal Fish and Wildlife Permit Application Form

RCVD APR 03 2018

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-1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

Type of Activity:

IMPORT OF SPORT-HUNTED BONTEBOK TROPHIES FROM SOUTH AFRICA

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 WOODWARD	1 b. First name KIRK	1 c. Middle initial [REDACTED]	1 d. Suffix
2. Date of birth (mm/dd/yyyy) [REDACTED]	3. Social Security No. [REDACTED]	4. Occupation [REDACTED]	5. Affiliation/ Doing business as (see instructions)
6 a. Telephone number	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		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)				
1 b. City Uernal	1 c. State Utah	1 d. Zip code/Postal code	1 e. County/Province	1 f. Country USA
2 a. Mailing Address (include if different than physical address, include name of contact person if applicable)				
2 b. City	2 c. State	2 d. Zip code/Postal code	2 e. County/Province	2 f. Country

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) _____ Date of signature (mm/dd/yyyy) 3/26/18

## E. IMPORT OF SPORT-HUNTED BONTEBOK TROPHIES from South Africa

**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 were 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:** The bontebok is listed as endangered under the Endangered Species Act. Applications for endangered species permits must be published in the Federal Register for a 30-day public comment period. Allow at least **90 days** for the application to be processed.

**Note 3:** This application can only be used if you have hunted/will be hunting in **South Africa**. If you have or will be hunting in a different country, please use form 3-200-20: <http://www.fws.gov/international/permits/by-form-number/index.html>

**Note 4:** USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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.

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 submit, indicate the application question number you are addressing. If applying for more than one trophy, be sure to indicate which trophy is addressed in each response.

1. How many Bontebok (*Damaliscus pygargus pygargus*) are you applying to import? Quantity: 1
2. At the time of the application, if bontebok is:
  - Alive, a. What is the approximate date of proposed take? 7/12/2016
  - Dead, b. What is the **date** you took the animal? \_\_\_\_\_
  - 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
  - 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]:  
Port Elizabeth, South Africa Rex Freight Forward 13 Amatole Street Port Elizabeth South Africa 6025
3. ENTER the name and address of the **landowner** on whose property the bontebok was or will be taken:

Name: Greg Harvey  
Business Name: Huntershill Safaris  
Address: PO Box 448  
Address: Queenstown  
City: Eastern Cape  
City: South Africa  
State/Province: 5320  
Country, Postal Code:

*Please be aware that the bontebok is listed in Appendix II of CITES. As such, you must obtain a CITES export permit from South Africa. If you are not exporting the trophy from South Africa directly to the United States, you will need to obtain a CITES Re-export certificate from the re-exporting country.*

4. a. Attach a signed statement from the **landowner** giving you permission to cull a bontebok from their captive herd.
- b. If available, provide a copy of the landowner's Certification of Registration for the bontebok herd. (Note: this is **not** a copy of the export permit or certificate issued by a South African province.) In order to meet the criteria for a permit under the Endangered Species Act, the bontebok must be culled from a ranch that has been certified by the Government of South Africa under their bontebok program. If the ranch is not registered, we may be unable to issue an import permit.
5. **Complete name and address** of overseas person or business shipping the trophy to you (this name will appear on the face of the permit).

Name: Greg Harvey  
Business Name: Umlindi Taxidermy  
Address: Braemore Farm Cradock  
Address: RSA 5880  
City: Eastern Cape  
State/Province:  
Country, Postal Code:

**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(ies) 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**).

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(ies) 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**).

Applicant's signature:  Date: 3/26/18

*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/fe/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 state 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):  
Kirk Woodward [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.



**WILDSCHUTTSBERG**  
GAME RESERVE

P O Box 448; Queenstown  
Game Reserve:- 045-966 9789  
Reservations:- 045-966 9789  
Fax:- 045-966 9789

---

15/07/2016

To Whom It May Concern:

I, Greg Harvey, have authorized

Kirk Woodward

Vernal Utah

Outfitter G.E. Harvey no. HC 70/2014 EC. Contact no 083 3013 930.

PH G E HARVEY PH 58/2016 EC

Gave the above client permission to hunt a Bontebok on myfarm

Regards

S Brunsdon  
WILDSCHUTTSBERG



## ***Certificate of Registration***

### ***BONTEBOK HERD***



***It is hereby certified that the  
Bontebok herd on  
the property Wildschutsberg, of  
Mr.Greg Harvey,  
in the Sterkstroom District of the Eastern Cape,  
South Africa, is certified as pure on the  
3<sup>rd</sup> April 2006***

***Presented to Mr.G.Harvey  
Date: 3<sup>rd</sup> April 2006***

***For; Chief Director: Environmental Affairs***

**Issued by: Department of Economic Affairs, Environment and Tourism  
Province of the Eastern Cape**

**CONVENTION ON  
INTERNATIONAL TRADE IN  
ENDANGERED SPECIES OF  
WILD FAUNA AND FLORA**

PERMIT / CERTIFICATE 171873

<input checked="" type="checkbox"/>	EXPORT
<input type="checkbox"/>	RE-EXPORT
<input type="checkbox"/>	IMPORT
<input type="checkbox"/>	OTHER

ORIGINAL

3. Importer (name and address) <div style="background-color: black; height: 40px; width: 100%;"></div>		2. Valid until <b>21-08-2017</b> OTHER	
3a. Country of import <b>U.S.A.</b>		4. Exporter / Re-exporter (name, address and country) <b>Umlindi Taxidermy</b> <b>Braemare Farm</b> <b>Cradock</b> <b>5886, RSA</b>	
5. Special conditions <b>THIS IS A TOPS integrated permit</b> <b>G. Harvey registered Bontebok breeder</b> <b>Huntersburg (Willemschuttsberg) Blocks 14 &amp; 15 must</b> <b>Stekvestroom RSA be completed before</b> <b>the export.</b> <small>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. Permit / certificate valid for one consignment only.</small>		6. Name, address, national seal / stamp and country of Management Authority <b>Department of Environmental Affairs</b> <b>Private Bag X447</b> <b>PRETORIA</b> <b>0001</b> <b>SOUTH AFRICA</b> 	
5a. Purpose of the transaction (see reverse) <b>H</b>		5b. Security stamp No. <b>1358414</b>	
7.6 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	
7.8 <b>DAMALISCUS P. PYGAEUS</b> <b>Bontebok</b>		9 <b>Flatskin</b>	
12 Country of origin*		11 Quantity (including unit)	
<b>A</b>		<b>ONE (1)</b>	
12a. Country of last re-export		11a Total exported / quota	
<b>B</b>		<b>ONE (1)</b>	
12b. No. of the operation ** or date of acquisition ***		11a	
<b>C</b>		<b>ONE (1)</b>	
12b. No. of the operation ** or date of acquisition ***		11a	
<b>D</b>		<b>ONE (1)</b>	
12b. No. of the operation ** or date of acquisition ***		11a	
13 THIS PERMIT / CERTIFICATE IS ISSUED BY:		14 EXPORT ENDORSEMENT	
<b>AB. MZAMO</b> <b>Blishe</b> Place		<b>22-02-2017</b> Date	
15. B of Lading / Air Waybill Number		Security stamp, signature and official seal	
Port of Export		Date	
Signature		Official stamp and title	



RCVD MAR 08 2018

**PLEASE BE SURE TO MAIL THE COMPLETED CITES  
PERMIT TO:**

**D&L CHB, LLC  
1500 MIDWAY COURT, STE W201  
ELK GROVE VILLAGE, IL 60007  
CTC: LISA OR LAURA**



**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 of Southern  
African Leopard and Namibian Southern White  
Rhinoceros**

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 <b>Campbell</b>	1 b First Name <b>Jana</b>	1 c Middle Name/initial	1 d. Suffix
2 Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>			

**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, P.O. Box, etc.) <b>(b) (6)</b>				
1 b. City <b>Aberricane</b>	1 c. State <b>UT</b>	1 d. Zip code/Postal code <b>(b) (6)</b>	1 e. Country <b>USA</b>	
2 a. Mailing address (include if different than physical address; include name of company) <b>(b) (6)</b>				
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>Trisa Lamm</b> <b>2/25/2018</b>	

Please continue to next page



**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND  
NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** *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 4:** Certain hunting trophies, including leopard 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.

- Complete all questions on the application.
- Mark questions that are not applicable with "N/A".
- If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.
- If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

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.

D&L CMB LLC  
1500 Midway Crt, 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@dldb.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.

n/A

4. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):
- a. Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20.
  - b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia  
Quantity:        (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).

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 ANIMAL HAS ALREADY BEEN TAKEN, please enter the following:

- d. 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, Kazumba Ranch, Eastern Province  
 S14 deg 22 319' E 030 deg 31 685'

- e. Date wildlife is to be hunted:

9/4/2017

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

Jason Stone / Kazumba Game Ranch

- g. 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]:

Bangweulu Taxidermy  
4142/K Chifwema Rd  
New Kasama, 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.

- a. 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:  
Address:  
City:  
State/Province:  
Country, Postal Code:

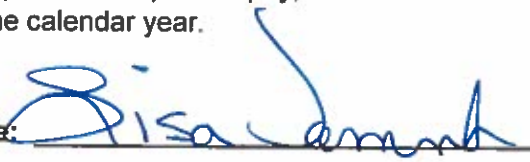
Bangweulu Taxidermy  
4142/K Chifwema Rd  
New Kasama  
Lusaka, Zambia

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. 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: 2/25/2018

10. 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.*

11. 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

(b) (6)



**CUSTOMS POWER OF ATTORNEY**  
and  
**Acknowledgement of Terms and Conditions of Service**

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(Revised 07/34)

✓ appropriate box: ☒ Individual  
☐ Partnership  
☐ Corporation  
☐ Sole Proprietorship  
☐ Limited Liability Company

SS#

(b) (6)

KNOW ALL MEN BY THESE PRESENTS: That, Jana Campbell doing  
business as a INDIVIDUAL (Full name of individual, partnership, corporation, sole proprietorship, or limited liability company) (Capacity)  
residing or having a principal place of business at (b) (6) under the laws of the State of Utah  
appoints D & L CHB (Grantor'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 enclosures 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, unloading 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, unloading, 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 date of its execution);

Grantor acknowledges receipt of D & L CHB Terms and Conditions of Service governing all transactions between the Parties.  
(Grantor's Name)

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 Jana Campbell  
caused these presents to be sealed and signed: (Signature) [Signature]  
(Capacity) N/A Date: 02/26/19  
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.



RCVD MAR 08 2018

**PLEASE BE SURE TO MAIL THE COMPLETED CITES  
PERMIT TO:**

**D&L CHB, LLC  
1500 MIDWAY COURT, STE W201  
ELK GROVE VILLAGE, IL 60007  
CTC: LISA OR LAURA**



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

RCVD MAR 08 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 of Southern  
African Leopard and Namibian Southern White  
Rhinoceros**

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 <b>Campbell</b>	1.b. First Name <b>Byron</b>	(b) (6)
(b) (6)	3.a. Alternate Telephone Number	4. E-mail address <b>lisa@dldhbrm</b>

**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. P (b) (6)				
1.b. City <b>Bakersfield</b>	1.c. State <b>CA</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.f. Country <b>USA</b>	
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)	
<b>Lisa Jamnik</b>	<b>2/25/2018</b>

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND  
NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** *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 4:** Certain hunting trophies, including leopard 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.

- Complete all questions on the application.
- Mark questions that are not applicable with "N/A".
- If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.
- 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.

D&L CHB LLL  
1500 Midway Art, 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  
lisa.j@dichb.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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):
- a. Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20.
- b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity:        (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).

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 ANIMAL HAS ALREADY BEEN TAKEN, please enter the following:

- d. 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, Maswa Game Reserve

- e. Date wildlife is to be hunted:

11/13/2017

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

Bushman Hunting Safaris Ltd

- g. 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]:

Bushman Hunting Safaris  
Plot No 61-64 Block E Khanda Ind  
Morogoro, 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).

Permit # 2010371

8. Complete name and address of overseas person or business shipping the trophy to you.

- a. 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:  
Address:  
City:  
State/Province:  
Country, Postal Code:

Bushman Hunting Safaris  
Plot No 61-64 Block E  
Khanda Ind Complex  
Morogoro Tanzania

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. 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:

Sisa Jamit

Date:

2/25/2018

10. 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.*

11. 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

# CUSTOMS POWER OF ATTORNEY

and

## Acknowledgement of Terms and Conditions of Service

Copyright 1995, National Customs Brokers and Forwarders Association of America, Inc.  
(Revised 07/04)

✓ appropriate box:

- ☒ Individual  
☐ Partnership  
☐ Corporation  
☐ Sole Proprietorship  
☐ Limited Liability Company

SS#

(b) (6)

KNOW ALL MEN BY THESE PRESENTS: That, ✓ Byron (b) (6) Campbell doing

business as a ✓ INDIVIDUAL

(Individual, partnership, corporation, sole proprietorship, or limited liability company) (Identify)

under the laws of the State of ✓ CALIFORNIA

residing or having a principal place of business at ✓ (b) (6)

BAHIA VISTA CA (b) (6)

appoints ✓ D & L CHB

(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, unloading 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, unloading, 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 Terms and Conditions of Service governing all transactions between the Parties.

(Grantee's Name)

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 ✓ Byron (b) (6) Campbell

(Full name of company)

caused these presents to be sealed and signed: (Signature) ✓ [Signature]

(Capacity) ✓ N/A

Date: 8-29-17

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.

ORIGINAL

19591

## THE UNITED REPUBLIC OF TANZANIA

MINISTRY OF NATURAL RESOURCES AND TOURISM

November 06, 2017 12:55:18 pm



MAIN PERMIT

IN.# 3120589

RETURN DATE:

Monday, December 18, 2017

APP: 2010370

## GAME HUNTING PERMIT

PERMIT NO.

2010371

Station	ARUSHA	Start Date	November 07, 2017	End Date	November 27, 2017	Package Type	21 DAYS	Extra Days:	0
This RESIDENT'S / VISITOR'S Permit is Granted to		BYRON CAMPBELL		of Address		Passport No.		(b) (6)	
Who holds Weapon (Type)		RIFLE		Calibre		416		Maker's No:	
Licence No:		B007638		Dated		24-Oct-2017		Issued At	
and entitles him to hunt the below animals in the (Game area and blocks)		owned by		BUSHMAN HUNTING SA, ARIS (T) LTD		Weapon owner & Address		BYRON CAMPBELL	
PH BRIAN VAN BLEEK, SIMON OWEN EVANS,		PH CAT.		LICENSE No.					
Additional Blocks									

SPECIES	No.	SAME SPECIES BOUGHT THIS YEAR
1 BABOON OLIVE	3	
3 BUFFALO AFRICAN CAPE	3	
5 BUSHBUCK CROBE	1	
7 BUSHPIG	1	
9 DIKDIK KIRK'S	1	
11 DUiker COMMON	1	
13 ELAND PATERSON'S	1	
15 GAZELLE ROBERT'S	1	
17 GAZELLE THOMSON'S	2	
19 GREY BLOTCHED	1	
21 HARTBEEST CORP'S	2	
23 NYAEMA SPOTTED	1	
25 IMPALA EAST AFRICAN	2	
27 JACKAL SILVER BACKED	1	
29 KLIPSCHINGER	1	
31 LEOPARD	1	
33 OSTRICH	1	
35 PORCUPINE CRESTED	1	
37 RAZEL (HONEY BADGER)	1	
39 REEDBUCK BOROR	1	
41 TOPI	2	
43 WARTHOG	1	
45 WATERBUCK/DEFASSA	2	
47 WILDEBEEST EASTERN WHITE BEARDED	2	
49 ZEBRA BURCHELL'S	2	

Signature of Holder

Signature of Issuing Officer &amp; Official Stamp



- 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 shotgun 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 TOURISM  
WILDLIFE DIVISION

November 06, 2017 12:55:20 pm

PERMIT NO.

2010371

CLIENT NAME

BYRON JOSEPH CAMPBELL

19591

COMPANY

BUSHMAN HUNTING SAFARIS (T) LTD

REGISTER OF GAME KILLED (INCLUDES WOUNDED ANIMALS)

PH NAME

BRIAN VAN BLERK, SIMON OWEN EVANS,

PH LICENSE NO

SPECIES	No.	AREA WHERE HUNTED	WEAPON USED	DATE 2017	TIME	SEX	GPS COORDINATES	LENGTH OF HORN/ANIMAL	OR WEIGHT	REMARKS
S/N# 45 DEFASSA WATERBUCK	ONE	MASWA G.R.(N)	416	07/11/2017	3 P.M.	M	36 M 0656225 UTM 9706149	25 1/2"		
49. BURCHELLS ZEBRA	ONE	MASWA G.R.(N)	416	07/11/2017	530 P.M.	M	36 M 0655437 UTM 9705556	20.5"		OLD SKULL ON
39. BOHOR REEDBUCK	ONE	MASWA G.R.(N)	416	08/11/2017	915 A.M.	M	36 M 0659743 UTM 9703246	9 1/2"		
25 E.A. IMPALA	ONE	MASWA G.R.(N)	416	08/11/2017	1030 A.M.	M	36 M 0661852 UTM 9699719	28 1/2"		
1. OLIVE BABOON	ONE	MASWA G.R.(N)	416	08/11/2017	105 A.M.	M	36 M 0662591 UTM 9698133	0.40 DOG.		
17. THOMSONS GAZELLE	ONE	MASWA G.R.(N)	416	08/11/2017	330 P.M.	M	36 M 0655422 UTM 9703228	13 1/2"		
3. CAPE BUFFALO	ONE	MASWA G.R.(N)	416	09/11/2017	1145 A.M.	M	36 M 0658414 UTM 9695940	42"		
41. TOPI	ONE	MASWA G.R.(N)	416	09/11/2017	520 P.M.	M	36 M 0653758 UTM 9704226	15"		
3. CAPE BUFFALO	ONE	MASWA G.R.(N)	416	11/11/2017	1250 P.M.	M	36 M 0653278 UTM 9694764	41" x 14 1/2"		
47 E.W.B. WILDEBEEST	ONE	MASWA G.R.(N)	416	12/11/2017	1230 P.M.	M	36 M 0674272 UTM 968051	25 1/2" SPREAD		
47. E.W.B. WILDEBEEST	ONE	MASWA G.R.(N)	416	12/11/2017	1351 P.M.	M	36 M 0673583 UTM 9680144	24 1/2" SPREAD		
31. LEOPARD	ONE	MASWA G.R.(N)	416	13/11/2017	635 A.M.	M	36 M 0656390 UTM 9705405	7'8"		
13. PATTERSONS ELAND	ONE	MASWA G.R.(N)	416	13/11/2017	250 P.M.	M	36 M 0661394 UTM 9689896	34 1/2"		

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.

SIGNATURE OF THE HUNTING CLIENT

SIGNATURE OF THE PROFESSIONAL HUNTER

SIGNATURE OF WILDLIFE OFFICER INCHARGE





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

OMB No. 1018-0164  
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

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

Type of Activity:

Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros

RCVD MAR 08 2018

RCVD MAR 08 2018

LB

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

A. Complete if applying as an individual			
1 a Last name Zaharopoulos	1 b First name Ilias	1 c Middle name or initial	1 d Suffix
2 Date of birth (mm/dd/yyyy) (b) (6)	3 Occupation	4 Affiliation/ Doing business as (see instructions)	
5 a Telephone number (b) (6)	5 b Alternate telephone number (925) 417 5270	5 c Fax number (925) 417 0170	5 d E-mail address import@b.hunter-international.net

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 Lancaster	1 c State CA	1 d Zip code/Postal code (b) (6)	1 e County/Province	1 f Country USA	
2 a Mailing Address (include if different than physical address, include name of contact person if applicable) -same-					
2 b City	2 c State	2 d Zip code/Postal code	2 e County/Province	2 f Country	

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Atty. In Fact for Ilias Zaharopoulos 02/28/2018 Signature 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 OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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:

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

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: **Niassa Game Reserve, Block L7 Luwire, Niassa Province, MOZAMBIQUE**

- b. Date wildlife was hunted: **June 19, 2017**

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

**Skull, Full Skin**

- 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 Textafrica, Bairro Da Soalpo, Chimoio, Mozambique**

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 appear on the face of the export permit].

Name: Business **Derek Littleton**  
Name: Address: **Luwire Safaris Lda**  
Address: **Block L7, Niassa Game Reserve**  
City: **Niassa Province**  
State/Province: **MOZAMBIQUE**  
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: Atty. In Fact for Ilias Zaharopoulos Date: 02/28/2018



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. I understand that I may only import two African elephant trophies in one 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 proposed activity. While the Service will attempt to assist where possible, 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).

ALL US F&W Designated Port of entry

9. 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):

HUNTER INT'L BROKERAGE SERVICES, INC.  
5674 Stoneridge Drive, Suite 209  
Pleasanton, CA 94588

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):

Vanessa Tabugan  
Tel# (925) 417 5270 ext 104 / E-mail: [import@b.hunter-international.net](mailto:import@b.hunter-international.net)

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?

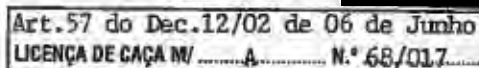
☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

[illegible][illegible]

### **REGISTO DOS ANIMAIS E ANOTAÇÕES DA FISCALIZAÇÃO**

[illegible]

UML EP 200-2016



Áreas de caça (b) (6) LUWIRE

Nome **ILIAS ZACAROPOULOS**

Idade

Nacionalidade **GREGA**

Residência HELLAS

Data de emissão 24 / 05 / 2017

Válido até 30 / 11 / 2017

Taxes paid



O CAÇADOR DEVE CONHECER TODAS AS LEIS DE CACA

**CUSTOMS POWER OF ATTORNEY**

and

Acknowledgement of Terms and Conditions of Service

Social Security number (b) (6)

Date of birth (b) (6)

Know all men by these presents: That,

**Ilias Zaharopoulos**

(Full legal name of individual)

residing at (b) (6)

**Lancaster, CA (b) (6)**

(Residential or physical mailing address, P.O. Box is not accepted)

hereby constitutes and appoints: **HUNTER INTERNATIONAL BROKERAGE SERVICES, INC., its officers, authorized employees and duly appointed sub-agents** to act for and on its behalf as a true and lawful agent and attorney of the grantor named above for and in the name, place, and 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, carnet or other document required by law or regulation in connection with the importation, transportation, or exportation of any merchandise shipped or consigned 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 of manufacture 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, unloading 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 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, unloading, or operation of any vessel or other means of conveyance owned or operated by 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 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;

To waive the requirement of other Customs Brokers transmitting a copy of the customs entry CF7501 and the Customs Broker's bill of services directly to the undersigned grantor in accordance with CF 111.36(a) & (b). Such entry summary and bill will be transmitted through Hunter International Brokerage Services, Inc. It is also understood that the agreement between Hunter International Brokerage Services, Inc. and other Customs Brokers does not forbid or prevent the Customs Broker from having direct contact with the grantor in accordance with CFR 111.36(c)(3).

To generally to transact at the customs houses in any district any and all customs business, including making, signing, and filing of protests under section 514 of the Tariff Act of 1930, 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 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 forgoing power of attorney to remain in full force until notice of revocation in writing is duly given to and received by a District Director of Customs.

The undersigned grantor of this power of attorney hereby agrees to **HUNTER INTERNATIONAL BROKERAGE SERVICES, INC.** Terms and Conditions of Service, which are attached hereto and incorporated herein by reference.

IN WITNESS WHEREOF, the said (Print full legal name)

**Ilias Zaharopoulos**

has caused these presents to be sealed and signed: (Signature)

*Ilias Zaharopoulos*(Capacity) **Individual**

(Date)

**02/23/2018**

Important note: If you are the importer of record, payment to the broker will not relieve you of liability for Customs charges (duties, taxes or other debts owed Customs) in the event the charges are not paid by the broker. Therefore, if you pay by check, Customs charges may be paid with a separate check payable to the "U.S. Customs Service" which shall be delivered to Customs by the broker. Importers who wish to utilize this procedure must contact our office in advance to arrange timely receipt of duty checks.

**(Mandatory requirement to validate this POA is to provide a CLEAR copy of your passport or driver's license or have this document notarized and mail to our office at Hunter Int'l., 5674 Stoneridge Drive, Ste 209, Pleasanton, CA 94588, tel (925) 417-5270, fax (925) 417-0170)**







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

OMB No. 1018-0164  
Expires 11/30/2016

## Federal Fish and Wildlife Permit Application Form

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

**Type of Activity:**  
**Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

RCVD MAR 0 10

26

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 Hixson	1 b. First name Robert	1 c. Middle name or initial (b) (6)	1 d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Occupation	4. Affiliation/ Doing business as (see instructions)	
5 a. Telephone number (b) (6)	5 b. Alternate telephone number (925) 417 5270	5 c. Fax number (925) 417 0170	5 d. E-mail address import@b.hunter-international.net

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 Dallas	1 c. State TX	1 d. Zip code/Postal code (b) (6)	1 e. County/Province	1 f. Country USA	
2 a. Mailing Address (include if different than physical address; include name of contact person if applicable) -same 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 <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA31915C-0 No <input type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Atty. In Fact for Robert (b) Hixson Jr. 02/23/2018 Signature of applicant/person responsible for permit (No photocopied or stamped signature) Date of signature (mm/dd/yyyy)

Please continue to next page



**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import is limited to two per hunter per calendar year)  
**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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:

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

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: Ivory Safaris, Chikwa, Zambia
- b. Date wildlife was hunted: 07/21/2016
- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):  
Skull, Full mount, including claws & 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 document]:

Life-Form Taxidermy  
7 Aluminium Road, Box 763, White River, 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 appear on the face of the export permit].

Name: Business Life-Form Taxidermy  
Name: Address: 7 Aluminium Road  
Address: Box 763  
City: White River  
State/Province: South Africa  
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: Atty. In Fact for Robert Hixson Jr. Date: 02/23/2018

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. I understand that I may only import two African elephant trophies in one 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.*

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).

Any US F&W Port of Entry

9. 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):

HUNTER INT'L BROKERAGE SERVICES, INC.

5674 Stoneridge Drive, Suite 209

Pleasanton, CA 94588

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):

Vanessa Tabugan

Tel# (925) 417 5270 ext. 104 / [import@b.hunter-international.net](mailto:import@b.hunter-international.net)

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.

# REPUBLIC OF ZAMBIA

The Zambia Wildlife Act  
(Act No. 17 of 1998)

LFZAWA Form 2

The Zambia Wildlife (Licences and fees) Regulations, 2007

## NON RESIDENT HUNTING LICENCE No 17389

(Regulation 3 (2))

Station of Issue Chilanga

Date of Issue: 21/07/16

### DETAILS OF LICENSEE

Full Name: ROBERT HAYSON

Passport No. (b) (6)

Nationality U.S.A.

Tel/Fax

Address

Full Name of Safari company Ivory Saf

Company Cert. Incorporation No.

Date of Incorporation

Postal Address: Road (b) (6)

Residential Address

Firearm Licence/Tourist's Firearm import No.

Calibre of Firearm(s) 375

Type of Hunt

Hunting Block CHIKWA

PER TO25: 35

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 following 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\$
<u>Leopard</u>	<u>1B+</u>	<u>M</u>	<u>Chikwa</u>	<u>2016</u>	<u>2650</u>
			<u>INSQ 3</u>		
Total Animals Fees					<u>\$2650</u>
Concession Fees					<u>—</u>
Grand TOTAL					<u>\$2650</u>

#### Note:

Original copy returned by the Licensee

Duplicate copy forwarded to the Director General or to an agent

Triplicate to be signed in the book

Date

21/07/16

[Signature]

Director General





CONVENTION ON  
INTERNATIONAL TRADE IN  
ENDANGERED SPECIES OF  
WILD FAUNA AND FLORA

REPUBLIC OF ZAMBIA

☒ EXPORT PERMIT/CERTIFICATE No. 51273

☐ RE-EXPORT

☐ IMPORT

☐ OTHER:

2. Valid until  
15-05-2018

Original

3. Importer (name and address)  
Mr. Robert Hixon  
c/o Life Farm Taxidermy  
7 Platinum Road  
Box 763  
White River

4. Exporter (name and address country)  
Bangweulu Taxidermy and  
4421K Chifwema Road  
New Kasama  
Lusaka  
Zambia

5a. Country of Import  
South Africa

5. Special conditions  
Leopard skin Tag #2m PAR 16 47/300  
Import Permit #167144, 167156  
Tucks: Zm16/015/16-7 CK T1  
Zm16/016/18-9 CK T2

6. Name, address, national seal/stamp and country of management Authority  
ZAMBIA WILDLIFE AUTHORITY  
PRIVATE BAG 1, CHILANGA  
ZAMBIA  
Telefax 278365  
278244

7a. Purpose of the transaction (see reverse)  
H

7b. Security stamp N°  
1561419

7a. Scientific Name (genus and species) AND COMMON NAME OF ANIMAL OR PLANT	9. Description of specimens, including identifying marks or numbers (specify if live)	10. Appendix No. and source (see reverse)	11. Quantity (including unit)	11a. Total export/Quota
7a. <u>Panthera pardus</u> Leopard	9. Skull Full skin	10. I(W)	11. (02) Two	11a. 35 of 2017 300
7a. <u>Loxodonta africana</u> African Elephant	9. Tuck	10. I(W)	11. (01) One	11a. 010 of 2017 160
7a. <u>Loxodonta africana</u> African Elephant	9. Tuck	10. I(W)	11. (01) One	11a. 011 of 2017 160
7a. <u>Loxodonta africana</u> African Elephant	9. 2 Ears, 4 Feet 2 Piece of Skin	10. I(W)	11. (08)	11a. 011 of 2017

13. THIS PERMIT IS ISSUED BY:

Chilanga 16-11-2017

Wanza

Security stamp, signature and official seal

14. EXPORT ENDORSEMENT:

15. Bill of Lading/Air Waybill Number: 083-9072-18713

Stock	Quantity
A	2 (Two)
B	1 (One)
C	1 (One)
D	8 (Eight)


Port of Export: K.K.I.A. Date: 1/12/2017

MINISTRY OF TOURISM AND  
DEPARTMENT OF NATIONAL PARKS AND  
WILDLIFE  
- 4 DEC 2017



<input type="checkbox"/>	EXPORT
<input type="checkbox"/>	RE-EXPORT
<input checked="" type="checkbox"/>	IMPORT
<input type="checkbox"/>	OTHER

2. Valid until 06 Sept 2018

<b>3. Importer (name and address)</b> Mr Robert (b) Hixson c/o Lefeton T. Perry 7 Aluminium Road Box 763 White River		<b>4. Exporter / Re-exporter (name, address and country)</b> Bangwelu Taxidermy Ltd 4142K Chifwema Road New Kasanga Lusaka ZAMBIA	
<b>3a. Country of import</b> SOUTH AFRICA		<b>5. Name, address, national seal / stamp and country of Management Authority</b> Department of Environmental Affairs Private Bag X447 PRETORIA 0001 SOUTH AFRICA	
<b>5. Special conditions</b> (without attached conditions (Annex B page 2)) Export permit Certificate from Zambia Tag: ZM PAR 16 471300 Export permit 51273 dtd. 16-11-2017  <small>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. Permit / certificate valid for one consignment only.</small>			
<b>5a. Purpose of the transaction (see reverse)</b> 14		<b>5b. Security stamp No.</b> 1365732	
<b>7.8 SCIENTIFIC NAME (genus and species) AND COMMON NAME OF ANIMAL OR PLANT</b>		<b>9. Description of specimens, including identifying marks or numbers (age/sex) if live</b>	
7.8 <b>Leopard</b> Panthera pardus		9 <b>Skull</b> full skin	
<b>12. Country of origin*</b> A		<b>11a. Total exported / quota</b> 11a 351300 / 2017	
<b>12. Country of origin*</b> B		<b>12b. No. of the operation ** or date of acquisition ***</b>	
<b>12. Country of origin*</b> C		<b>12b. No. of the operation ** or date of acquisition ***</b>	
<b>12. Country of origin*</b> D		<b>12b. No. of the operation ** or date of acquisition ***</b>	
<small>* 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</small>			
<b>13. THIS PERMIT / CERTIFICATE IS ISSUED BY:</b> K.D. Makange			
Nelspruit Place		07 Sept 2017 Date	
<b>14. EXPORT ENDORSEMENT</b>		<b>15. Bill of Lading / Air Waybill Number</b> 8340728713	
Block A B C D		Quantity 01 (OR) OF EACH	
Port of Export JNB		Date 10/01/2018	
Signature P. M. M. M.		Date 10/01/2018	
environmental affairs Department of Environmental Affairs REPUBLIC OF SOUTH AFRICA Cancelled by an Environmental Management Inspector P. M. M. M.			

Signature 7144 C2.

**PERMIT CONDITIONS FOR THE INTERNATIONAL IMPORT, EXPORT OR RE-EXPORT OF CITES AND NON-CITES SPECIES AND ANY PRODUCTS THEREOF; NOI.-CITES LIVE WILD ANIMALS, LIVE EXOTIC ANIMALS, HUNTING TROPHIES, WILD ANIMAL PRODUCTS, PROTECTED PLANTS AND LIVE FISH**

OR Tambo International Airport is the only port designated for 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 aircraft within the Gauteng Province.


Import permits are not valid unless the imported consignment is accompanied by a valid (original) export permit from the country of origin (if required), which must be handed to the authorized Environmental Management Inspector on inspection.

**THE FOLLOWING CONDITIONS ARE APPLICABLE TO:**

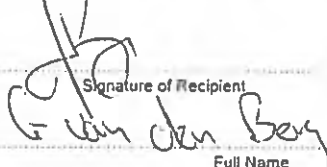
- (A) **ALL INTERNATIONAL IMPORTS, EXPORTS AND RE-EXPORTS OF CITES AND NON-CITES SPECIES AND ANY PRODUCTS THEREOF; LIVE WILD ANIMALS, LIVE EXOTIC ANIMALS, HUNTING TROPHIES, WILD ANIMAL PRODUCTS, PROTECTED PLANTS AND LIVE FISH (INCLUDING AIR, MAIL, RAIL, ROAD, AND SEA)**

**THIS PERMIT**

1.
  - a) Shall not be transferable;
  - b) Shall be invalid until the signature of the holder thereof been appended thereto;
  - c) This permit is not valid unless it has been endorsed and released by an authorized Environmental Management Inspectorate 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 Inspectorate 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 Inspectorate 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 7.
3. Inspections are by appointment only and early booking is necessary. An authorized Environmental Management Inspectorate 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, Waybill/s and Bill of entry/s (SAD/ DA 550) must be presented for inspection. A photo copy of all these documents must also be handed to the Environmental Management Inspectorate officer 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 of destination as shown on the containers must coincide with the country of destination as on the permit. The details on the packing list/s must coincide with the details on the permit/s and Waybill/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 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 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 Inspectorate 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.

  
Signature of Issuing Officer  
  
DOROTHY MAKARINGE  
Full Name

2017-12-07
Date
WILLIAM ...
...

  
Signature of Recipient  
30/12/2017  
Date  
  
G van den Berg  
Full Name

Conditions to this permit are subject to the provisions of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Regulations & the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004).

# CUSTOMS POWER OF ATTORNEY

and

C# 11285

## Acknowledgment of Terms and Conditions of Service

Social Security number (b) (6)

Date of birth (b) (6)

Know all men by these presents: That,

Robert

Hixson

(b) (6) legal name of individual)

residing at

Dallas, TX

(Residential or physical mailing address, P.O. Box is not accepted)

hereby constitutes and appoints: **HUNTER INTERNATIONAL BROKERAGE SERVICES, INC., its officers, authorized employees and duly appointed sub-agents** to act for and on its behalf as a true and lawful agent and attorney of the grantor named above for and in the name, place, and 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, carnet or other document required by law or regulation in connection with the importation, transportation, or exportation of any merchandise shipped or consigned 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 of manufacture 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, unloading 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 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, unloading, or operation of any vessel or other means of conveyance owned or operated by 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 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,

To waive the requirement of other Customs Brokers transmitting a copy of the customs entry CF7501 and the Customs Broker's bill of services directly to the undersigned grantor in accordance with CF 111.36(a) & (b). Such entry summary and bill will be transmitted through Hunter International Brokerage Services, Inc. It is also understood that the agreement between Hunter International Brokerage Services, Inc. and other Customs Brokers does not forbid or prevent the Customs Broker from having direct contact with the grantor in accordance with CFR 111.36(c)(3)

To generally to transact at the customs houses in any district any and all customs business, including making, signing, and filing of protests under section 514 of the Tariff Act of 1930, 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 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 forgoing power of attorney to remain in full force until notice of revocation in writing is duly given to and received by a District Director of Customs.

The undersigned grantor of this power of attorney hereby agrees to **HUNTER INTERNATIONAL BROKERAGE SERVICES, INC.** Terms and Conditions of Service, which are attached hereto and incorporated herein by reference

IN WITNESS WHEREOF, the said (Print full legal name)

Robert

Hixson

has caused these presents to be sealed and signed. (Signature)

(Capacity)

(Date)

6/7/17

Important note If you are the importer of record, payment to the broker will not relieve you of liability for Customs charges (duties, taxes or other debts owed Customs) in the event the charges are not paid by the broker. Therefore, if you pay by check, Customs charges may be paid with a separate check payable to the "U.S. Customs Service" which shall be delivered to Customs by the broker. Importers who wish to utilize this procedure must contact our office in advance to arrange timely receipt of duty checks

**(Mandatory requirement to validate this POA is to provide a CLEAR copy of your passport or driver's license or have this document notarized and mail to our office at Hunter Int'l., 5674 Stoneridge Drive, Ste 209, Pleasanton, CA 94588, tel (925) 417-5270, fax (925) 417-0170)**



# TEXAS DEPARTMENT OF PUBLIC SAFETY

5805 N. LAMAR BLVD • BOX 4087 • AUSTIN, TEXAS 78773-0001

DRIVER LICENSE INFORMATION

[www.dps.texas.gov](http://www.dps.texas.gov)

512/424-2600

EN ESPANOL 512/424-7181

9BDW0GA1 0016 015537

ROBERT (b) (6) HIXSON (b) (6)

(b) (6)

DALLAS TX (b) (6)

(6)

Attached is your new driver license/identification card.

Please check your new attached card very carefully. If you find any errors, email [DriverLicenseErrors@dps.texas.gov](mailto:DriverLicenseErrors@dps.texas.gov) or call the Contact Center at (512) 424-2600. If there are no errors it is very important that you destroy your previous driver license or identification card. It is a violation of Texas State Law to have more than one driver license or identification card in your possession.

Thank You and Please Drive Safe!

Did you know you can....

- Get your driver record immediately online at [www.texas.gov](http://www.texas.gov)
- Pay Driver Responsibility Program surcharges at [www.txsurchargeonline.com](http://www.txsurchargeonline.com)
- Pay Driver License reinstatement fees at [www.texas.gov/driver](http://www.texas.gov/driver)

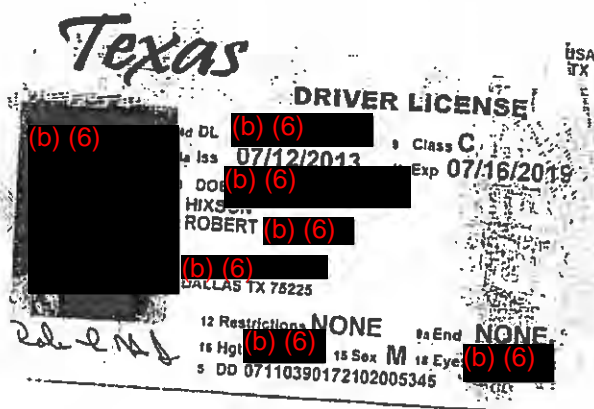
Did you know you have....

- 30 days to change your address when you move
- An option to record an emergency contact phone number, directive to physician and allergic reactions to drugs on the reverse side of your card

Be the Frontline Protection for Texas

Become a Texas State Trooper

[www.joinidps.com](http://www.joinidps.com)









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: 1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

Type of Activity:  
**Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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 <b>Benben</b>	1 b. First name <b>Michael</b>	1 c. Middle name or initial <b>(b) (6)</b>	1 d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Social Security No. <b>(b) (6)</b>	4. Occupation <b>(b) (6)</b>	5. Affiliation/ Doing business as (see instructions) <b>(b) (6)</b>
6 a. Telephone number <b>(b) (6)</b>			

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

C. All applicants complete address information			
1 a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes) <b>(b) (6)</b>			
1 b. City <b>Racine</b>	1 c. State <b>WI</b>	1 d. Zip code/Postal code <b>(b) (6)</b>	1 e. County/Province <b>(b) (6)</b>
1 f. Country <b>USA</b>			
2 a. Mailing Address (include if different than physical address, include name of contact person if applicable) <b>Same-contact Ruth Benben (wife)</b>			
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? <b>from 1989-</b> Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: <b>don't know number</b> No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter 1 of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.	
Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) <b>March 5 2018</b> Date of signature (mm/dd/yyyy)	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**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 were 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:** The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

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, Matabeleland South, Bulye Valley Conservancy, Beit Bridge(nearest town)
  - b. Date wildlife is to be hunted:  
May 20, 2018 thru June 4, 2018
  - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).  
skull & Full skin
3. **IF THE ANIMAL IS DEAD**, please enter the following:
  - a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: 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):

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

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 appear on the face of the export permit].

Name: Mazunga Safaris

Business Name:

Address: 8 Norfolk Road Hillside

Address:

City: Bulawayo

State/Province: Zimbabwe

Country, Postal Code: Africa

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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:                     

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: March 5 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.*

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 (b) Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Port- Chicago, IL USA

Contact Mike Lewis @ Coppersmith Inc. 760 Bonnie Lane  
Elk Grove Village, IL 60007 Phone: 847-437-1500 Ext 220

9. 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):

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 (b) Benben cell: (b) (6)  
(6) email: (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.







**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 of Southern  
African Leopard and Namibian Southern White  
Rhinoceros**

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 <b>Owen</b>	1.b. First Name <b>Randy</b>	1.c. Middle Name/Initial <b>(b) (6)</b>	1.d. Suffix
2. (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 #, or P.O. Box)				
(b) (6)				
1.b. City <b>Attica</b>	1.c. State <b>MI</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>
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)	
<b>RJ</b> <b>(b) (6)</b> <b>Owen</b> <b>03/8/2018</b>	
Please continue to next page	

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND  
NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit to the address on page one.**

**Note 2:** 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:** *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 4:** Certain hunting trophies, including leopard 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.

- **Complete all questions on the application.**
- **Mark questions that are not applicable with "N/A".**
- **If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.**
- **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.

*Name + address same as page 1. Yes on expedited shipping*

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

*Randy Owen,*

(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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):
- a. Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20.
- b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: N/A (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).

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 ANIMAL HAS ALREADY BEEN TAKEN, please enter the following:

- d. 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, Kawanda Camp, Muze / Zumbo

- e. Date wildlife is to be hunted: August 30<sup>th</sup> thru September 12<sup>th</sup>, 2017

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

Mozambique Safaris Lda

- g. 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 TextAfrica, Bairro Da Soalpo, Chimoio, Mozambique  
Tel +258 251 24661 - fax +258 251 24657 - Mozinfo@emiac.com

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.

- a. 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: *Andrés Rodríguez-Villa*  
Business Name: *Mozambique Safaris Lda*  
Address: *Kawanda Camp*  
Address:  
City: *Muze/Zumbo*  
State/Province: *Tete*  
Country, Postal Code: *Mozambique*

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. 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: \_\_\_\_\_

10. 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: \_\_\_\_\_

Rgt (b) (6) Owen

Date: 03/08/2018

*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.*

11. 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).





**Commercial Invoice**

INVOICE Nº: M01185	Date: 2017/12/06	File Nº: J-9927
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<b>Consignee:</b>	Randy (b) (6) Owen
<b>Address:</b>	(b) (6) Attica, MI (b) (6), USA
<b>Contact Details:</b>	T: (b) (6)
<b>Consignee's Taxidermist:</b>	Timberline Taxidermy via The Wildlife Gallery
<b>Address:</b>	1790 Gover Parkway, Mt. Pleasant, MI 48858, USA
<b>Contact Details:</b>	T: 001 989 561 5369 E: taxidermy@thewildlifegallery.com
<b>Clearing Agent in USA:</b>	Coppersmith - ORD
<b>Shipping Agent:</b>	EMIAC (Pty) Ltd
<b>Address:</b>	53 Maple Street, Pomona, Kempton Park, 1619, Gauteng, RSA
<b>Contact Details:</b>	Tel +27 11 392 1657 - Fax +27 11 392 2403 - senta@emiac.com
<b>Consignor:</b>	EMIAC Moz Lda
<b>Address:</b>	Complexo Textafrica, Bairro Da Soalpo, Chimoio, Mozambique
<b>Contact Details:</b>	Tel +258 251 24661 - Fax +258 251 24657 - mozinfo@emiac.com

QTY	DESCRIPTION	UNIT PRICE	TOTAL
Delivered directly to our facility by Mozambique Safaris			
	<b>Preparation of the following trophies for Export</b>		
1	Yellow Baboon skull/fullskin	\$ 75.00	\$ 75.00
1	Bushbuck skull&horns/fullskin	\$ 80.00	\$ 80.00
1	Crocodile fullskin (incl. skull)	\$ 275.00	\$ 275.00
1	Spotted Hyena skull/fullskin	\$ 125.00	\$ 125.00
1	Johnston's Impala skull&horns/fullskin	\$ 80.00	\$ 80.00
1	Leopard skull/fullskin	\$ 125.00	\$ 125.00
1	Warthog skull&tusks/fullskin	\$ 80.00	\$ 80.00
3	Applications for CITES permits only (Baboon/Croc/Leopard)	\$ 225.00	\$ 675.00
	Application for all required Export Docs & Permits	\$ 350.00	\$ 350.00
	Wrapping, Packing & Crating Charges	\$ 150.00	\$ 150.00
	Mozambique Customs Clearance Charges	\$ 225.00	\$ 225.00
	Road Freight Charges to RSA Bonded Warehouse	\$ 250.00	\$ 250.00
	Facilitation Charges	\$ 150.00	\$ 150.00
	<b>Total excluding insurance</b>	<b>Total US \$</b>	<b>\$ 2 640.00</b>
<b>Optional Loss &amp; Damage Protection Charge for trophies received at our facility: Cover from date of receipt of payment until date of delivery thereof to nominated destination</b>		\$ 27 815.95	\$ 556.32
	<b>Total including insurance</b>	<b>Total US \$</b>	<b>\$ 3 196.32</b>

All final destination charges such as Customs Clearance, Storage, Inspection Fees and Final delivery charges are excluded from this Invoice. and EMIAC cannot be held responsible for any statutory 3rd Party Increases such as fuel





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 of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros

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 <b>Benben</b>	1 b. First name <b>Michael</b>	1 c. Middle name or initial <b>(b) (6)</b>	1 d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Social Security No. <b>(b) (6)</b>	4. Occupation <b>(b) (6)</b>	5. Affiliation/ Doing business as (see instructions) <b>(b) (6)</b>
6 a. Telephone number <b>(b) (6)</b>	6 b. Alternate telephone number <b>(b) (6)</b>	6 c. Fax number <b>(b) (6)</b>	6 d. E-mail address <b>(b) (6)</b>

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

C. All applicants complete address information					
1 a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes) <b>(b) (6)</b>					
1 b. City <b>Waterford</b>	1 c. State <b>WI</b>	1 d. Zip code/Postal code: <b>(b) (6)</b>	1 e. County/Province <b>(b) (6)</b>	1 f. Country <b>U.S.A.</b>	
2 a. Mailing Address (include if different than physical address, include name of contact person if applicable) <b>same-contact Lynn Benben (wife)</b>					
2 b. City	2 c. State	2 d. Zip code/Postal code	2 e. County/Province	2 f. Country	

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: <b>28307 14US97517A/9</b> No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in Chapter B of Chapter 1 of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <b>3-5-2018</b> 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 OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**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 were 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:** The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

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, MatabelelandSouth, Buby Valley Conservancy, Beit Bridge (nearest town)
  - b. Date wildlife is to be hunted:  
5/20/2018 thru 6/4/2018
  - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).  
skin, skull, claws for life size mount
3. **IF THE ANIMAL IS DEAD**, please enter the following:
  - a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild:  
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):

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

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 appear on the face of the export permit].

Name: Mazunga Safaris

Business Name:

Address: 8 Norfolk Road Hillside

Address:

City: Bulawayo

State/Province: Zimbabwe

Country, Postal Code: Africa

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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:  Date: 3-5-2018

*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.*

8. All international shipment(s) must be through a designated port. A list of designated port (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).  
Port-Chicago, Illinois, USA  
Contact Mike Lewis, Coppersmith Inc. 760 Bonnie Lane  
Elk Grove Village, IL 60007 Phone: 847-437-1500 Ext 220

9. 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):

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):

Mike Benben cell: (b) (6)  
email: (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.





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: 1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

Type of Activity

**Import of Sport-hunted Trophies of Southern  
African Leopard and Namibian Southern White  
Rhinos**

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 <b>REEVES</b>	1 b. First Name <b>ARLENE</b>	1 c. Middle Name/Initial <b>(b) (6)</b>	1 d. Suffix
<b>(b) (6)</b>			

**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>(b) (6)</b> (om #; no P.O. Boxes)			
1 b. City <b>ENNIS</b>	1 c. State <b>TEXAS</b>	1 d. Zip code/Postal code <b>(b) (6)</b>	1 e. Country <b>USA</b>
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. 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)	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND  
NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** *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 4:** Certain hunting trophies, including leopard 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.

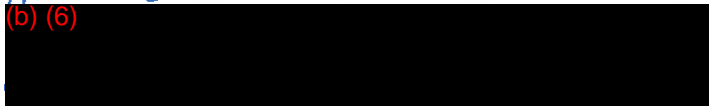
- Complete all questions on the application.
- Mark questions that are not applicable with "N/A".
- If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.
- If importing trophies from more than one country, you must submit a separate application for each shipment in 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)?

ARLENE REEVES

(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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

- a. Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20.
- b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: NA (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).

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, Nuanetsi, North/South Masvingo

- b. Date wildlife is to be hunted: April 16 - 30 2018

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

Safari Air Services 733 Iona Close - Borrowdale, Harare, Zimbabwe

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

NA

- d. 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:

- e. Date wildlife is to be hunted:

- f. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
- g. 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.
- a. 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:  
Address:  
City:  
State/Province:  
Country, Postal Code:
- NA

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. 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.

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). 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: \_\_\_\_\_

10. 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:

Adrian Renee

Date: 3-5-18

*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.*

11. 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).

Houston, Texas



ROUND MAR 03 2016

**PLEASE BE SURE TO MAIL THE COMPLETED CITES  
PERMIT TO:**

**D&L CHB, LLC  
1500 MIDWAY COURT, STE W201  
ELK GROVE VILLAGE, IL 60007  
CTC: LISA OR LAURA**





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

OMB No. 1018-0164  
Expires 11/30/2016

**Federal Fish and Wildlife Permit Application Form**

RCVD MAR 08 2018

LB

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

**Type of Activity:**  
**Import of Sport-hunted Trophies of**  
**Southern African Leopard, African Elephant, and**  
**Namibian Southern White Rhinoceros**

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 Goodwin	1.b. First name Brandon	1.c. Middle name or initial	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Occupation		
4. Affiliation/ Doing business as (see instructions)			
5.a. Telephone number (b) (6)	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address lisa@dlchb.com

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 Channahon	1.c. State IL	1.d. Zip code/Postal code: (b) (6)	1.e. Country/Province USA
2.a. Mailing Address (include if different than physical address; include name and address of person to whom correspondence should be sent)			
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. Country/Province
2.f. Country			

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Signature of applicant/person responsible for permit (No photocopied or stamped signatures) <i>Lisa J. Smith</i> Date of signature (mm/dd/yyyy) <i>1/31/2018</i>	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

full skin & skull,  
see attached picture 2 lucky bones

3. **IF THE ANIMAL IS DEAD**, please enter the following:

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

Omloiy menage #39 Namibia

- b. Date wildlife was hunted:

4/27/2017

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

skull, full skin  
see attached picture

- 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]:

Karoo Taxidermy  
15 Van Der Bult St  
Great-Benet 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 appear on the face of the export permit].

Name: Business

Name: Address:

Address:

City:

State/Province:

Country, Postal Code:

J. Wambach  
P.O. Box 11647  
Windhoek, Namibia

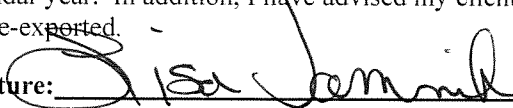
5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion 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. I understand that my client may only import two African elephant trophies in one calendar year. 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:

1/31/2018

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. I understand that I may only import two African elephant trophies in one 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.*

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).

Chicago

9. 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):

DAL CHB, LLC, 1500 Midway Court, Ste W200  
EIK Grove Village, IL 60007

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):

Lisa Jamnik 847-690-0690  
lisa@dalchb.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.







Villavicencio, Jorge <jorge\_villavicencio@fws.gov>

**PRT# US80969C/9**

1 message

**Lisa Jamnik** <LisaJ@dlchb.com>  
To: F&W/JORGE-SPVR <jorge\_villavicencio@fws.gov>

Wed, Mar 14, 2018 at 9:55 AM

Hey Jorge,  
Please see the attached application for Brandon Goodwin, this is the guys that took the leopard out of Namibia shipped to South Africa had some work done and is now being shipped to the states. I wasn't sure I did the app right you told me just to send it and you would change if wrong. Thank you

And thank you for talking to me today even though I got lost in whats happening.

**\*\*PLEASE LIKE US ON FACEBOOK\*\***  
**GO TO D&L CUSTOM HOUSE BROKERS**

Thank You & Best Regards,  
Lisa Jamnik  
D&L CHB  
T:847-690-0690  
F:847-690-0699  
C:262-949-1730

*Reexport  
out of  
South Africa*

-----Original Message-----

From: xerox5335@dlchb.com [mailto:xerox5335@dlchb.com]  
Sent: Wednesday, March 14, 2018 8:22 AM  
To: Lisa Jamnik  
Subject: Scanned from a Xerox multifunction device

Please open the attached document. It was sent to you using a Xerox multifunction printer.

Attachment File Type: pdf, Multi-Page

Multifunction Printer Location: machine location not set  
Device Name: XRX9C934E731872

For more information on Xerox products and solutions, please visit <http://www.xerox.com>



**Scanned from a Xerox Multifunction Printer.pdf**  
1249K

RCVD MAR 20 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 of Southern  
African Leopard and Namibian Southern White  
Rhinos**

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 <b>VALLÉE</b>	1.b First Name <b>LAURENCE</b>	(b) (6)	1.d Suffix
--------------------------------	-----------------------------------	---------	------------

(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**

(b) (6)				
1.b City <b>GROSSE POINTE FARMS</b>	1.c State <b>MICHIGAN</b>	1.d Zip code/Postal code <b>(b) (6)</b>	1.e County/Province	1.f Country <b>U.S.A.</b>
2.a Mailing address (include if different than physical address include name of company)				
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>(b) (6)</b> <b>03/09/2018</b>
Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND  
NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit to the address on page one.**

**Note 2:** 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:** *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 4:** Certain hunting trophies, including leopard 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.

- **Complete all questions on the application.**
- **Mark questions that are not applicable with "N/A".**
- **If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.**
- **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.

**SEND TO ADDRESS ON PAGE 1**

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

**LAURENCE VALLEE**

(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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):
- a. Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20.
  - b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia  
Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).

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:

SAVE VALLEY CONSERVANCY, MASVINGO PROVINCE, ZIMBABWE  
CONCESSION NAME: SANGO. NEAREST CITY: BULAWAYO OR HARARE

- b. Date wildlife is to be hunted:

JULY 17-30 2018

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

UPMARKET SAFARIS

IAN BARTHELOM - P.H.

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

- d. 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

- e. Date wildlife is to be hunted:

N/A

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

N/A

g. 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).

N/A

8. Complete name and address of overseas person or business shipping the trophy to you.

a. 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:

Address:

City:

State/Province:

Country, Postal Code:

N/A

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. 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.

N/A

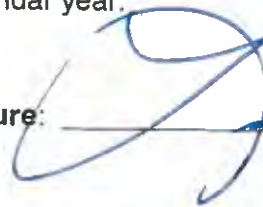
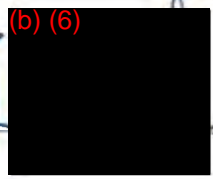
Taxidermist/Broker's signature: \_\_\_\_\_ Date: \_\_\_\_\_



10. 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:

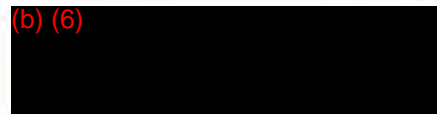
 (b) (6) 

Date: 03/09/2018

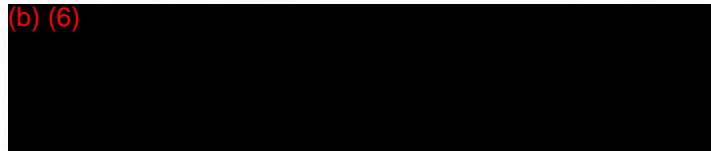
*Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain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

11. 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).

SOCIAL SECURITY #

(b) (6) 

OCCUPATION -

(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 Bull Elephant 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: Dwight Miloff

Name: Dwight Miloff

Date: 3/8/18



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**

MAR 23 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 Miloff	1.b. First name Dwight	1.c. Middle name or initial (b) (6)	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 Billings	1.c. State Montana	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province	1.f. Country USA	
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) Same 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. 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) <i>Dwight Miloff</i>	Date of signature (mm/dd/yyyy) <i>3/8/18</i>

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 Address

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

Dwight Miloff (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.

Loxodonta Africana African Elephant

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 in Zimbabwe . Nearest City is Victoria Falls.

b. Date wildlife is to be hunted: 10/5/2018 thru 10/18/2018

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

KLIPKRAAL SAFARI SERVICES & AGENCIES. Gary Hopkins 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:

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

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:

Collette's, 15 Josiah Chinamano Road, Bulawayo Zimbabwe.

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 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**). 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: Dwight Miloff Date: 3/8/18

*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).

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 Matetsi Safari Area Elephant populations are basically overflow populations from two major populations being that of the Greater Hwange Areas and Greater Chobe Areas. Counts from both these populations combined is over 50000 Elephants.

**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 the landowner, community, or government?**

Funds generated from the Safaris directly work for the whole safari operation. Being employment of Professional Hunters, trackers, skinners, cooks, waiters, camp staff etc., plus also providing employment to National Parks employees as well; in the form of Permits Officers Warden, Game Rangers etc. Indirectly helping with economy of the nearest local town (Victoria Falls) with food, general supplies, fuel etc. all being purchased from here, thus again stimulating the country economy by providing jobs etc. Meat that is harvested from the animals taken also used to help feed the people in the Safari area.

**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?**

Rev.

Funding again generated from safaris also are allocated to anti-poaching activities that not only benefit elephant (although Elephant are always a priority) but other game as well.

# 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



# Zimbabwe



## ESTIMATED TOTAL ELEPHANTS

**82,630 ± 8,589**

## GUESSES

**1,635 - 1,805**

## GENERAL STATISTICS

Country Area	390,580 km <sup>2</sup>
Range Area	81,228 km <sup>2</sup> (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  $82,630 \pm 8,589$  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  $78,839 \text{ km}^2$ , 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 Matabeleland.

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  $11,656 \pm 2,259$  (Dunham et al., 2015c). The previous comparable estimate was  $19,297 \pm 2,527$  in 2001 (Mackie, 2002). The 2014 figure replaces an estimate from the AESR 2007 of  $19,981 \pm 2,392$  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  $3,407 \pm 1,215$  (Dunham et al., 2015b) which replaces an estimate of  $15,024 \pm 2,133$  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  $53,991 \pm 7,711$  (Dunham et al., 2015a), which replaces an estimate of  $49,310 \pm 7,051$  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 Ngwasha/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  $11,120 \pm 2,709$  (Dunham & van der Westhuizen, 2015). This replaces an estimate of  $4,987 \pm 1,577$  from a comparable 2001 survey. Another survey in 2009 gave an estimate of  $9,123 \pm 1,898$  (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  $332 \pm 519$  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  $1,585 \pm 1,295$  for the Savé Valley Conservancy. This replaces an estimate of  $527 \pm 310$  (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  $35 \pm 99$  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 Buby 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 (km <sup>2</sup> )
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
<b>Totals 2015</b>	<b>82,630</b>	<b>8,589</b>	<b>1,635</b>	<b>1,805</b>		
<b>Totals 2006</b>	<b>93,122</b>	<b>7,068</b>	<b>534</b>	<b>625</b>		
Assessed Range					97 %	78,839
Unassessed Range					3 %	2,389
<b>Total Range</b>					<b>100 %</b>	<b>81,228</b>

## 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 (km <sup>2</sup> )
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
<b>Totals</b>	<b>-10,492</b>	<b>±11,124</b>	<b>+1,101</b>	<b>+1,180</b>	<b>97 %</b>	<b>78,839</b>

## AREA OF RANGE COVERED BY EACH DATA CATEGORY

DATA CATEGORY	KNOWN RANGE (km <sup>2</sup> )	POSSIBLE RANGE (km <sup>2</sup> )	TOTAL RANGE (km <sup>2</sup> )
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
<b>Totals</b>	<b>80,213</b>	<b>1,016</b>	<b>81,228</b>



INPUT ZONE	REASON FOR CHANGE	SURVEY DETAILS			# OF ELEPHANTS		SOURCE	PFS	AREA (km <sup>2</sup> )	MAP LOCATION	
		TYPE	RELIAB.	YEAR	ESTIMATE	± 95% CL				LONG.	LAT.
Chegutu Safari Area	NG	O	E	2014	150		Dunham, 2015	2	445	29.6°E	17.9°S
<b>Greater Mapungubwe</b>											
Tuli, Maramani, Sentinel, Nottingham	RS	AT	A	2014	212		Selier & Page, 2015	2	1,192	29.4°E	22.0°S
<b>Lower Zambezi Valley</b>											
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
<b>Northwest Matabeleland</b>											
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
<b>Sebungwe</b>											
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

INPUT ZONE	REASON FOR CHANGE	SURVEY DETAILS			# OF ELEPHANTS		SOURCE	PFS	AREA (km <sup>2</sup> )	MAP LOCATION	
		TYPE	RELIAB.	YEAR	ESTIMATE	± 95% CL				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
<b>Southeast Lowveld</b>											
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);

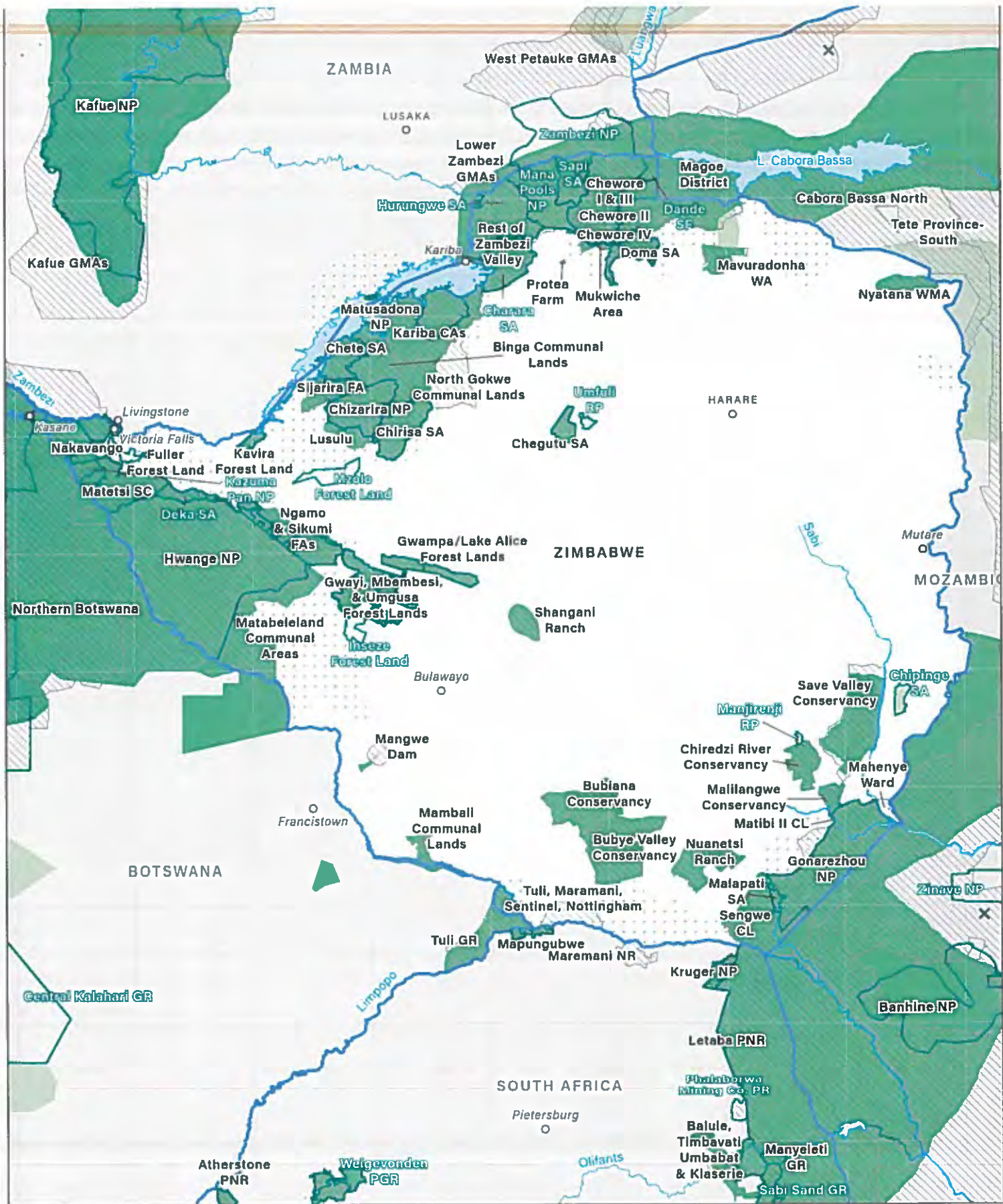
— : No Change

## 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.

## 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).



ABBREVIATIONS AND ACRONYMS



Int'l Boundaries

Rivers & Lakes

ELEPHANT RANGE

Known



## 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 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: \_\_\_\_\_

(b)  
(6)

Name: Mark Saulsbury

Date: 03-05-2018





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

OMB No 1018-0164  
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

MAR 23 2018

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

Type of Activity:  
Import of Sport-hunted Trophies of  
Southern African Leopard African Elephant and  
Namibian Southern White Rhinoceros

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 Saulsbury	1.b. First name Mark	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Occupation	4. Affiliation/ Doing business as (see instructions) N/A	
5.a. Telephone number (b) (6)	5.b. Alternate telephone number	5.c. Fax number	5.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 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 Odessa	1.c. State Texas	1.d. Zip code/Postal code (b) (6)	1.e. County/Province USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)			
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province
2.f. Country			

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: unknown No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter 1 of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature of applicant/person responsible for permit (No photocopied or stamped signatures) <u>Mark Saulsbury</u> Date of signature (mm/dd/yyyy) 03/05/2018	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: N/A (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: 1 (Import is limited to two per hunter per calendar year)  
**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: N/A (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: Namibia, Nyae-Nyae Conservancy, OTJOZONDJUPA Region, Nearest Town: Tsumkwe

- b. Date wildlife was hunted: August 8, 2017

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

2 Tusks, 2 Ears, Cape, 2 Skin Panels, 1 Tail

- 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]:

International Air Cargo Services, Unit No. 10, Northern Industrial Park, Newcastle Street, Windhoek  
Namibia

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 appear on the face of the export permit].

Name: Business S.M. Jacobs SMJ Safaris

Name: Address:

Address: P.O. Box 601

City: Grootfontein

State/Province: Namibia

Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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 current enhancement finding for Namibia.**

**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. I understand that my client may only import two African elephant trophies in one calendar year. In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

N/A

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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:  Date: 3-5-18

*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.*

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 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):

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](mailto: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.



CONVENTION ON  
INTERNATIONAL TRADE IN  
ENDANGERED SPECIES OF  
WILD FAUNA AND FLORA

PERMIT / CERTIFICATE No.

☒ EXPORT

☐ RE-EXPORT

☐ IMPORT

☐ OTHER:

0055547

Original

2 Valid until

3 Importer (name and address)

(b) (6)

3a Country of import

4 Exporter / Re-exporter (name, address and country)

5 11 2008

5 11 2008

5 11 2008

Signature of the applicant

5 Special conditions

1. This permit is certified by the Namibian customs  
2. 17 0033 32 15 & N = 17 0034 32 25

All imports and exports remain subject to veterinary regulations.  
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 a transport to the  
IATA Live Animals Regulations

6 Name, address, national seal, stamp and country of Management Authority



MINISTRY OF ENVIRONMENT AND  
TOURISM

Directorate Scientific Services  
Private Bag 13306  
Windhoek  
NAMIBIA

5a Purpose of the transaction (see reverse)

5b Security stamp N

5b Security stamp N

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

7 / 8 African elephant

9 2x Tusk

10 1

11 1

11a 1

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 \*\*\*

7 / 8 African elephant

9 2x tusks, 2 x ears, 2 x  
pancreas 2 x

10 0

11 8 items

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 \*\*\*

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 \*\*\*

7 / 8

9

10

11

11a

12 Country of origin Permit No. Date

12a Country of last re-export Certificate No. Date

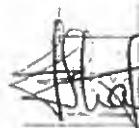
12b No. of the operation \*\* or  
date of acquisition \*\*\*

- 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

MINISTRY OF ENVIRONMENT  
AND TOURISM  
REPUBLIC OF NAMIBIA

13 THIS PERMIT IS ISSUED BY

28 FEB 2010



Windhoek  
842525 Fax: 25986

Place

Date

Security stamp, signature and official seal

14 EXPORT ENDORSEMENT

15 Bill of Lading / Air Waybill Number

Block	Quantity
A	
B	
C	
D	

Port of Export / Re-export

Date

Signature

Official stamp and title

Original

Namprint 2008



**MINISTRY OF ENVIRONMENT AND TOURISM**

Directorate Scientific Services  
Private Bag 13306  
Windhoek, Namibia  
Enquiries: Chief Warden  
Permit Office



Tel +264-61-284 2111  
Fax +264-61-258 861

PERMIT No.:

173572

VALID FROM:

01.08.17

VALID TO:

14.08.17

**PERMIT TO HUNT FOR TROPHIES**

Permission is hereby granted in terms of the Nature Conservation Ordinance 1975 (Ord. 4 of 1975)

Name of Trophy Hunter:

 M. <sup>(b)</sup><sub>(6)</sub> Scudsbury

Residential Address:

Country:

U.S.A

to hunt the specified number of game for the sake of trophies.


 Indicates species listed on CITES  
Appendix I or II

	SPECIES: COMMON NAME	Number
	Buffalo	
<del>Sps I</del>	Crocodile	/
	Dik-dik	
	Eland	/
<del>Sps II</del>	Elephant	/
	Giraffe	/
	Grey Duiker	/
<del>Sps II</del>	Hippopotamus	/
	Impala, Black-faced	/
	Impala, common	/
	Klipspringer	/
	Kudu	/
<del>Sps II</del>	Lechwe	/
	Oryx (Gemsbok)	/
	Ostrich	/
	Red hartebeest	/
	Reedbuck	/
<del>Sps I</del>	Rhinoceros, black	/
<del>Sps I</del>	Rhinoceros, white	/
	Roan	/
	Sable	/
	Springbok	/

	SPECIES: COMMON NAME	Number
	Steenbok	/
	Warthog	/
	Waterbuck	/
	Wildebeest, blue	
	Zebra, Burchell's	
<del>Sps II</del>	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
<del>Sps I</del>	Cheetah	
<del>Sps I</del>	Leopard	
<del>Sps II</del>	Lion	
	Other	
*Please report back within 14 days after hunt		
*No trophy hunting to be advertised on internet		

on the following farms / hunting concessions:

Nyce - Nyce Conservancy

Guided by (name of guides):

S.M. Jacobs

Cashier receipt No.: 2145667

Issued on: 27.6.17

Amount received: NS

R. Hebes

Authorizing officer

IMPORTANT: This permit is not valid if altered in any way.

473

Official MET date stamp

MINISTRY OF ENVIRONMENT AND TOURISM PERMIT TO HUNT FOR TROPHIES
2017-07-27
WINDHOEK PHOTOCOPYED FROM ORIGINAL 11/11/2017

Reported <sup>173 572</sup> R. Sanger 14/8/17

\*L=Left, R=Right, H=Horn, B=Base, RW=Rowland Ward  
No trophy hunter may hunt unless accompanied by a professional hunter,, master hunting guide or hunting guide.  
This permit must be kept on the person of the permit-holder at all times while hunting.  
Only guide(s) as specified on the permit ma conduct the hunt.



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](mailto:nacso@iway.na)

+

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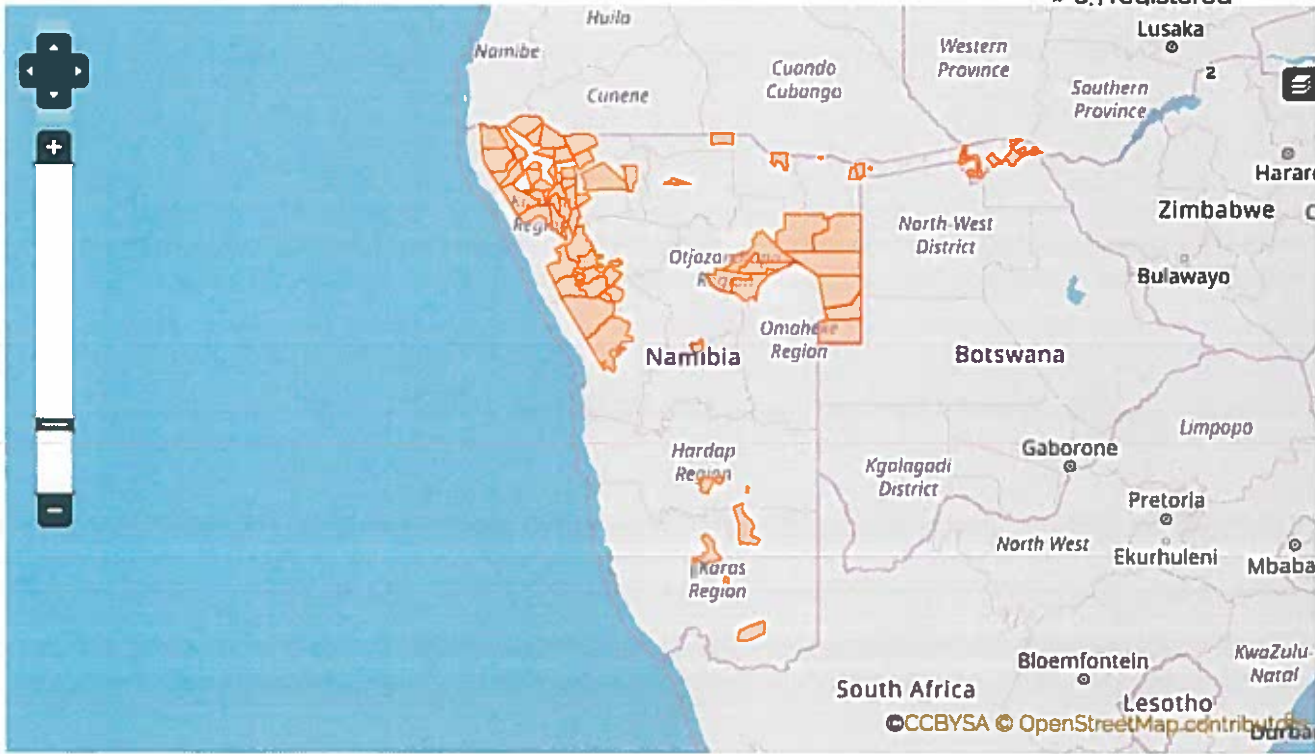
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Registered Communal Conservancies



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North West game count

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SRT

CCF

NNDFN

MRCC-UNAM

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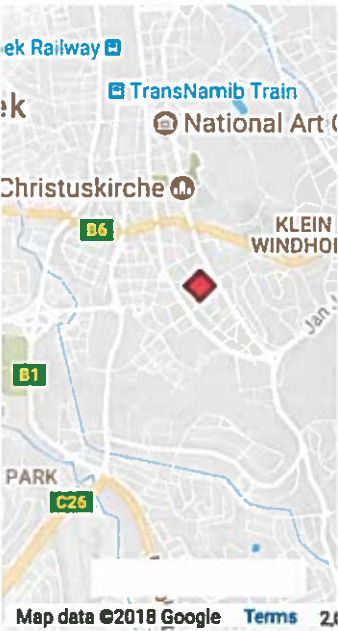
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Namibian Association of CBNRM Support Organisations

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nacso@iwayna

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Home » Conservation & conservancies » Conservancies » Nyae Nyae Conservancy »

## Nyae Nyae Conservancy

Meaning 'place without mountains, but rocky'

### Quick facts

Registered:	February 1998
Region:	Otjozondjupa
Area:	8,992 km²
Approximate population:	2,785
Geographical features:	



### Quick links

Ministry of Environment  
and Tourism (MET)  
website

MET regional offices

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North West game count

### NACSO full members

OAT

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## 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

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Paper submitted April 9, 2015; revised manuscript accepted October 6, 2015.

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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. 2011b; 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



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 CB-NRM 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<sup>2</sup> (Fig. 4). When conservancy income from tourism was removed, the effect was again negative but

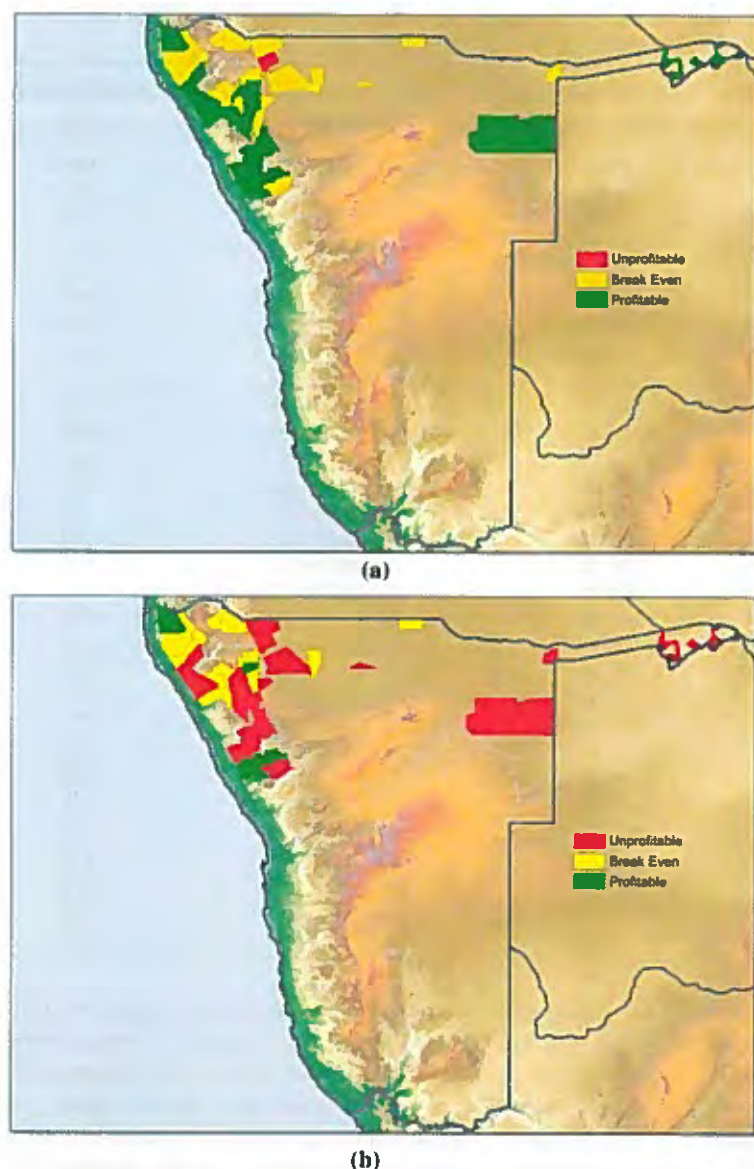


Figure 4. Revenues minus operating costs for 50 communal conservancies for which detailed management cost data were available in 2013 under (a) the status quo and (b) a simulated trophy hunting ban. Break-even conservancies indicate those for which revenues and operating costs are within \$5000 of one 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. 2011b). In addition, the first conservancies established were typically those with the highest potential to



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' popula-

tions 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. 2011b), evidence on possible negative impacts of trophy hunting on wildlife populations in other parts of Africa (Packer et al. 2010; Lindsey et al. 2013a) 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 (Crosmarty 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

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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



# Namibia



## ESTIMATED TOTAL ELEPHANTS

**22,754 ± 4,305**

## GUESSES

**90 - 90**

## GENERAL STATISTICS

Country Area	825,418 km <sup>2</sup>
Range Area	164,069 km <sup>2</sup> (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  $\pm$  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<sup>2</sup>, 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  $\pm$  3,580, 9,165  $\pm$  2,016, 14,097  $\pm$  2,678 and 13,116  $\pm$  3,413 (Chase, 2007; Craig & Gibson, 2013b, 2014; Craig, 2011b; Gibson & Craig, 2015a). The previous estimate in the AESR 2007 was 8,725  $\pm$  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#u 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  $\pm$  1,940, 3,638  $\pm$  1,164, and 6,413  $\pm$  2,566 (Craig & Gibson, 2013a; Gibson & Craig, 2015b; MET, 2012). The 2015 figure replaces an estimate of 3,758  $\pm$  2,289 for Khaudum, 61  $\pm$  115 for N#u Jaqna (Kolberg, 2004) and 967  $\pm$  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 Ukwuagali 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).



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  $3,378 \pm 1,756$  and  $2,810$  (confidence limits not available) (Kolberg, 2012; MET, 2012). The most recent **aerial sample count** from 2015 gave an estimate of  $2,911 \pm 637$  (Kilian, 2015) and replaces an estimate of  $2,057 \pm 598$  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  $314 \pm 154$  (MET, 2012). This replaces an estimate of  $210 \pm 157$  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 Houanib and Houarusib 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% CL	FROM	TO	PERCENT (%)	AREA (km <sup>2</sup> )
Aerial Sample Counts	22,754	4,306	—	—	42 %	68,121
Informed Guesses	0	—	90	90	10 %	16,162
<b>Totals 2015</b>	<b>22,754</b>	<b>4,305</b>	<b>90</b>	<b>90</b>		
<b>Totals 2008</b>	<b>15,807</b>	<b>3,276</b>	<b>20</b>	<b>20</b>		
Assessed Range					52 %	84,283
Unassessed Range					48 %	79,786
<b>Total Range</b>					<b>100 %</b>	<b>164,069</b>

## 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 (km <sup>2</sup> )
Repeat Survey	+6,947	±5,410	0	0	50 %	81,727
New Guess	0	0	+70	+70	2 %	2,556
<b>Totals</b>	<b>+6,947</b>	<b>±5,410</b>	<b>+70</b>	<b>+70</b>	<b>52 %</b>	<b>84,283</b>

## AREA OF RANGE COVERED BY EACH DATA CATEGORY

DATA CATEGORY	KNOWN RANGE (km <sup>2</sup> )	POSSIBLE RANGE (km <sup>2</sup> )	TOTAL RANGE (km <sup>2</sup> )
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
<b>Totals</b>	<b>112,471</b>	<b>51,598</b>	<b>164,069</b>

# ELEPHANT ESTIMATES

INPUT ZONE	REASON FOR CHANGE	SURVEY DETAILS			# OF ELEPHANTS		SOURCE	PFS	AREA (km <sup>2</sup> )	MAP LOCATION	
		TYPE	RELIAB.	YEAR	ESTIMATE	± 95% C.L.				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, 2015a	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

### 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.

### 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).

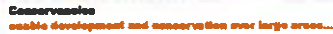


Living with wildlife  
the story of Nyae Nyae Conservancy



Nyae Nyae – Jul'hoansi for the place without mountains. But rocky

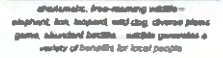
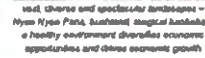
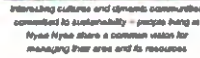




- 1931 - an NGO that over time evolves into the Nyuse Nyuse Development Foundation of Mambo is formed to support the community
- 1994 - the Nyuse Nyuse community begins the process to register as a conservancy
- 1998 - policy changes allow communal area residents to benefit from wildlife and tourism by forming conservancies
- 1998 - Nyuse Nyuse Conservancy is registered 7 February, becoming the first communal conservancy in Namibia
- 1998 - the Nyuse Nyuse Conservancy office is established at Berseba
- 2000 - each year, wildlife is re-introduced into the conservancy, including springbok, red hartebeest, gemsbok, eland, kudu and blue wildebeest, with a total of 2,300 animals being introduced

Region: Ojotorque	Size: 8,862 square kilometre
Approximate population: 2,300	Main language: Ju'hoansi
Date of registration: February 1998	

- a legally registered area with clearly defined borders and a constituted management body run by the community for the development of residents and the sustainable use of wildlife and tourism
- managed by a group selected to serve the interests of all its members
- a place where residents can add income from wildlife and tourism to traditional farming activities
- a place where wildlife populations increase as they are managed for productive gain
- a place where the value of the natural resources increases, enhancing the value of the land
- a forum through which services and developments can be channelled and integrated
- zones for multiple uses to minimise conflict and maximise the interests of stakeholders



Prior to Hamilton's independence in 1980, communal area residents had few rights to use wildlife. Wild animals were often seen as little more than a threat to crops, livestock and infrastructure, as well as communally safety. Group-breaking legislation passed in the mid-nineties laid the foundation for a new approach to the sustainable use of natural resources. By forcing a conservancy, people in communal areas can now actively manage their land and natural resources in a sustainable way, ensuring wildlife resources and environmental restoration. While a conservancy is a natural resource management structure, it is defined by sector law. Conservancies unite groups of people with the common goal of managing their resources. Today, over 60 communal conservancies embrace over 14 rural townships, underwriting a national commitment to both rural development and conservation.

The long process to mobilize, unite and support the Nyasa Nyasa community in forming a conservancy in a move already begun prior to Namibia's independence. In 1981, what is today the Nyasa Nyasa Development Foundation was formed to support the community in development and resource management. By the time the conservancy legislation was passed in 1985, the Nyasa Nyasa community was well placed to register the conservancy, which was gazetted in early 1986.

**San** (or **Sankhman**) Both terms have a slightly derogatory origin. **Sankhman** originates from the Dutch word *hagman* – an **outsider** who **lives** in the bush. **San** comes from the Nama *sa* – referring to poor people without cattle. While the Regional San Conference of 1903 adopted **San** as the official term, **Sankhman** has been lost (much of its negative connotation and today is taken to refer more to the great environmental knowledge and bush skills of the San).



## REFUGES AND ATTRACTIONS

### Conservancies are living landscapes...

The **sanctuary** of the San is legendary, an alien landscape of a balanced existence within the natural environment. The San have expert hunting skills and 'bush knowledge'. Their keen perception and understanding of the environment has allowed them to live in inhospitable ecosystems such as the Kalahari for countless generations. Nyae Nyae is rich in archaeological artefacts and recent finds indicate a presence of people from the Middle Stone Age. It seems likely that the ancestors of the Ju'/'hans have roamed some of the area for thousands of years and their traditional knowledge and skills have great value.

*stalking through African wilderness with a band of hunters, meandering through the veld gathering food, huddled around the evening fire watching traditional dances... the San culture has the power to inspire in us a search for a more harmonised existence*

Today, most people in Nyae Nyae no longer live an active hunter-gatherer lifestyle and find themselves very much in a state of cultural transition and social change. Yet wonderful living museums make the past accessible again – for both visitors and a new generation of San no longer in touch with their heritage. 'Keeping our culture alive for our children is one of the most important aspects of the living museum' says Komtes Daqen, a museum guide.

The vast, mostly unfenced Nyae Nyae **sanctuary** retains a strong wilderness atmosphere, which is enhanced by the location of the San culture. Located on the western rim of the Kalahari Basin – the largest accumulation of sand in the world – much of Nyae Nyae is covered by wind-blown sands. Areas of rocky ground retain occasional surface water in the so-called 'pans' (pools) (area of many pans). Here the Nyae Nyae Pans become a very important wetland after good rains. Nyae Nyae is generally flat, varying between 1,100 and 1,200 metres above sea level. The Aha Hills in the far south east of the conservancy create the only real topographical variation.



Huge baobabs punctuate the savanna woodland and create a sense of ancient Africa. Rainfall in Nyae Nyae is low and unpredictable, with an annual average of around 450 millimetres. The harshness of the environment is increased by high temperatures and extremely high evaporation. However, the water table is close to the surface, generally lying between two and 25 metres. All these environmental factors contribute to interesting habitat variations and the highest biodiversity found in the communal areas of the Okavango Region.



*a seemingly endless world of bushland and pampasveld, dotted here and there with the magical shapes of baobabs and brought to life by the mere expectation of seeing game, by the calls of lion and hyena at night... and by the light tread of the first people*

Since the establishment of conservancies, **wildlife** numbers in communal areas have rebounded from historic lows prior to independence. Nyae Nyae is one of the last refuges of the African wild dog in Namibia and the only place in the country where all of the Big Five occur – elephant, black rhino, lion, buffalo and leopard. Other mammals include gazelle, eland, kudu, blue wildebeest, reedbuck, gemsbok,



harebeest, springbok, duiker, steenbok, warthog, spotted and brown hyena, cheetah and jackal. More than 200 bird species have been recorded in the conservancy. During around the seasonal Nyae Nyae Pans is spectacular after good rains, when more than 10,000 waterbirds of over 80 species gather here, including great painted ardees, flamingos, wattled cranes and breeding wading egrets. The area has been designated an Important Bird Area by BirdLife International and is eligible for Ramsar Site status.

Nyae Nyae is also rich in flora, and over 100 species of edible plants are utilized by the San. Huge baobabs are the most distinctive feature of many landscapes, but many other plants are of interest and importance, including mesquite, leucodendron, termite tree, false mesquite and a variety of acacia trees, as well as devil's claw and Kalahari melon.

**Around Nyae Nyae...** The nearby Khomasdal National Park is known especially for its numbers of elephant and lion, as well as for its wilderness feel. Both Nyae Nyae and Khomasdal form part of the Kavango Zambezi Transfrontier Conservation Area (KAZA).

The initiative links five countries and is one of the largest contiguous conservation areas in the world, with the aim of facilitating wildlife movement, conserving natural resources and improving the lives of rural people.



## Conservancies

## empower rural people...

With a national population of around 30,000 the San constitute less than two percent of the total Namibian population and have the lowest per capita income of all language groups in the country. Many communities rely on a variety of support and are challenged by social disintegration, alcohol abuse and poverty. Only around 15 percent of San in Namibia have resource utilisation rights in land. The literacy rate is low of around 20%, with school attendance at only half the national average. The few opportunities for formal employment are thus rather inhibited by limited levels of formal education. The San have negligible representation in government and the Ju/'hoansi are one of only two out of



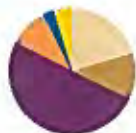
Nyae Nyae facilitates access to diverse training and capacity building, empowers individuals, especially women, to actively take part in decision-making, as well as instilling a renewed sense of pride in cultural heritage

the six San traditional authorities who have received official recognition. All this is the result of many years of marginalisation.

A variety of development initiatives by both government and non-government organisations over the last 35 years have attempted to move the San into modern society. Schools and health facilities have been developed, permanent water points have been established and livelihood hunting and gathering have been promoted. These activities have had a large influence on San culture. The Nyae Nyae Conservancy has returned natural resource user rights to the Ju/'hoansi community. San traditionally live in small groups in a democratic society that has never been structured into typical tribal leadership systems. Each group has a home ground or area with exclusive resource use rights. Around 40 settlements are spread throughout the conservancy.

Tsumkwe, originally a share water source, was established as the administrative centre of the area in 1958. An area of 30 square kilometres around Tsumkwe is included from the conservancy. The small town is the only place to buy goods and provides access to a combined school, a clinic and other government facilities and services. The nearest

hospital is outside the conservancy at Mangoch Dune and Grootfontein. There are five primary schools in Nyae Nyae and Ju/'hoansi speakers participating in the Village School Programme have access to schooling in their mother tongue.



Benefits to the conservancy and its members come from a variety of sources. Sources and amounts vary from year to year, depending on factors such as agreements with private sector partners, and market fluctuations. The pie chart shows the main benefit sources in 2011.



the conservancy is enabling a range of new livelihood options for its residents, including tourism, craft production, hunting and indigenous plant harvesting, all of which enable the Ju/'hoansi to utilise their traditional knowledge and skills

The people of Nyae Nyae today survive on a complex mix of livelihood activities. Wild food and occasional hunting still supplement other food sources, while livestock herding and small scale gardening are becoming increasingly important. The conservancy itself, as well as related natural resource use activities, provide employment and other benefits. The conservancy has paid for the development of numerous boreholes and distributed individual benefits each year, including annual cash payments, meat from trophy and own-use

hunting, the supply of blankets, solar radios and other goods.



hunting, the supply of blankets, solar radios and other goods.

The Tsumkwe Country Lodge, located in the town, is currently the only fixed tourism accommodation. While it does not have a formal relationship with the conservancy, lodge activities include village visits to the living museum of Maunabo Paa and Doo Paa, with income going directly to the villages. Another excellent cultural experience, the Living Hunter's Museum, is located at /Kakaba village along the track to Khutsum and includes a campsite. Wilderness campsites are also located at Maunabo, Doo Paa and Kromatshap and, although underdeveloped, provide nearby villages with some income.

Trophy hunting is currently the biggest source of income for the conservancy and also provides important employment. The area has yielded superb trophies and is considered one of the foremost big game hunting concessions in Namibia.

Nyae Nyae has received a lot of attention from local and international film makers and photographers, and the conservancy has received income from filming and photographic fees, although guidelines for these activities need to be improved and enforced.

The conservancy spends money and provides community and individual benefits in various areas. Areas and amounts vary from year to year depending on factors such as conservancy income and priorities. Private sector jobs are created through agreements with private sector partners. The pie chart shows the main expenditure areas in 2010.



## MANAGING NATURAL RESOURCES

### Conservancies Sustainable sustainability...

Nyee Nyee is divided into four areas for management purposes. The **management structures** include the conservancy board, made up of representatives of each area, as well as the paid positions of chairperson and conservancy manager. The board focuses on appointing the management committee and manager, as well as on strategic planning. The management committee consists of a minimum of five members, including the conservancy manager. It appoints staff, supervises performance and makes short-term decisions. Employees include 14 rangers, a CBMFA field officer, three water team staff, a craft trainer, a craft shop coordinator (funded through shop income), a devils



*the Nyee Nyee Conservancy provides vital structures for managing the communal natural resources of the area in a way that enhances development and ensures sustainability*

claw coordinator, an agriculture coordinator, an office administrator and a cleaner. Annual general meetings are attended by village representatives, the board and the management committee and are used to discuss on farm distribution, elect board members and the chairperson, approve annual budgets and work plans, as well as deliberate on strategies or programme amendments. The conservancy office is located in Tloane and Integrated Gharutu Circle. The office is owned by the conservancy, which also owns two four-wheel drives. Conservancy funds are spent on running costs, community development and individual benefit distribution. The funds are managed by a trust administered by the Nyee Nyee Development Foundation.

**Activities...** The conservancy is based on the traditional Ju/'hoansi **stare** land management system, which was recognised by government in 1991. Members have the right to hunt approved game within their stare on foot with bow and arrow, spears or bird traps. Hunting is reported to the stare owner and records are submitted to conservancy rangers and the Ministry of Environment & Tourism (MET). The conservancy has been zoned for a variety of land uses, including hunting and tourism.

Wildlife reintroductions have significantly boosted game numbers and increased the value of the area for tourism and trophy hunting. An annual game count, done as a simultaneous 'full moon count' of territories in the conservancy, is carried out in collaboration with the MET and the support of NGOs. Conservancy rangers also do active natural resource monitoring through the Event Book monitoring system, recording data such as game sightings, human wildlife conflict, poaching incidents, game utilisation and any other data deemed important by the conservancy. All data is aggregated into monthly and annual reporting charts that facilitate adaptive management. Based on the game count and Event Book information, the MET sets annual quotas for using wildlife.

The conservancy is active in mitigating human wildlife conflict. With support from the Nyee Nyee Development Foundation and other NGOs, the conservancy has developed 'elephant proof' water reservoirs for villages, which has reduced conflicts with elephants to isolated problems of gardens. A system of providing financial offsets for losses is being implemented through the National Policy on Human Wildlife Conflict Management. It will be applied by the conservancy with MET assistance.

*the conservancy uses a mix of modern technologies and traditional knowledge and skills to enable healthy wildlife populations, a productive environment, and the effective management of natural resources*

A grazing management project seeks to ensure sustainable use of rangeland and mitigate the effects of overgrazing. The conservancy has also attempted to address widespread insecurity from neighbouring communal areas. The devils claw coordinator helps with sustainable harvesting methods and the required permit system, as well

as collecting harvests for sale. Further support for the sector is provided by the Centre for Research Information Action in Africa (CRIA-SADC) and the Millennium Challenge Account - Namibia (MCA). In order to better manage all plant resources of the area, a community forest is in the process of formation, which will be closely integrated with the conservancy.





**Conservation****are full of opportunities...**

The wonderful mixture of environmental and cultural resources provides largely untapped potential in Nyae Nyae.

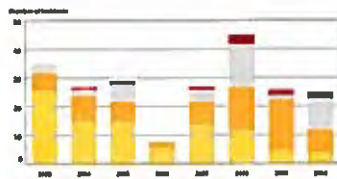
**Challenges...** The San culture is in a state of transition and is susceptible to external pressures, requiring sensitive and well-coordinated developments. Numerous government and NGO support agencies, with a mix of emphasis on social, religious, agricultural and environmental aspects, are active in Nyae Nyae. A more integrated approach to the various activities can facilitate a broader range of benefits for residents.

*Nyae Nyae harbours great potential to overcome the social and environmental challenges that the area seems to face — and the conservancy is the ideal structure to coordinate many of the developments*

Human wildlife conflict is a challenge where over people coexist with wild animals, especially if these include elephants and large predators. The creation of artificial water points has increased the resident elephant population in Nyae Nyae, which poses a threat to the area's woodlands, especially in the vicinity of water. Man-elephant, human elephant conflicts have been significantly reduced through village water point protection measures and water points for game. With increases in livestock, predator problems are also increasing. At least some of these can be mitigated by herding livestock and keeping it in secure enclosures at night. Importantly, predators and elephants are of great value, both to the ecosystem and to tourism, and in the long run the benefits gained from these species should outweigh the costs of living with them. Human wildlife conflicts can be further mitigated through actively enforced zoning that sets aside different areas for wildlife and agricultural uses.



There are many untapped tourism opportunities within Nyae Nyae, as well as the greater region. The mixture of the local San culture and authentic wilderness experience provides various development options. Interpretation through qualified guiding and excellent information materials can make the complexity of modern San societies and the diversity of the environment accessible to visitors.



Human wildlife conflicts are monitored using the Event Book, indicating trends and improvements, such as reduced elephant conflicts achieved through water point protection measures.



*strategic development, sensitive to social and cultural dynamics as well as the environment, can facilitate a bright future for the oldest and second largest conservancy in Namibia*

A variety of places for tourism development in Nyae Nyae exist. These need to be well coordinated and should receive continued input from tourism experts. While the planned developments are likely to fill most current gaps in accommodation needs, it is the interpretation of the products and the enhancement of the area's resources that can unlock the full potential. Tourism products could include well-led-out

bus-by-bus routes with wilderness camping, serviced campsites near roads but away from larger settlements, luxury lodges and tented camps, high quality local guiding, biking and other special interest tours. Improvements to the current infrastructure in Khomas, including the state of artificial waterholes, can facilitate the establishment of the Khomas tourism route while maintaining the area's wilderness appeal. The development of tourism routes through Nyae Nyae and Khomas into the Caprivi or Beaufort can help the area become one of Namibia's primary wilderness tourism destinations.

Hunting forms an integral part of the San culture. Trophy hunting can play a vital role, providing significant income to the conservancy through concession fees, as well as creating employment that utilizes

traditional San hunting skills. The superb hunting potential of the vast areas in conjunction with the San culture creates a unique and very valuable product. Zoning is especially important to maximize the potential of tourism and hunting products and strengthen core wildlife areas and tourism sites.

Developments should work through the conservancy or coordinate with it, as well as working with the Nyae Nyae Development Foundation. Strategic, well-coordinated initiatives can unlock the full value of the area's wildlife and natural plant products, the traditional knowledge and skills of the San, and of course both cultural and wilderness tourism, as well as trophy hunting and other forms of sustainable use. Numerous options exist that can enable a bright future for the conservancy.



**Come to Nyae Nyae - be part of the future...**









ROBERT (b) (6) FACCHINA

(b) (6) • NEW HOPE, PA (b) (6)

MAR 23 2018

March 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

**Re: Reissue Permit For Altai Argali That Was Not Shipped At The Same Time As Other Trophies**

To Whom it May Concern:

My name is Robert Facchina and I was issued Permit Number: MA35878C-0 (attached), this permit covers trophy taken during the 2017 hunting season (July 1, 2017 to September 30, 2017) for one (1) male Altai argali (*Ovis ammon ammon*) from the High Altai region of Mongolia and two (2) male Gobi argali (*Ovis ammon darwini*) from the Gobi region of Mongolia.

I successfully took all three trophies during my hunt July 14, 2017 and August 14, 2017. For circumstance out of my control all trophies were not shipped at the same time. The two male Gobi argali (*Ovis ammon darwini*) arrived in New York, along with a *Capra sibirica* Siberian Ibex. I was directed by our broker MIQ Logistics Fauna & Flora Division that they need the original permit #MA35878C-0 in order to clear these trophies through customs. The original was sent to NY and the trophies were cleared (see attached paperwork).

Now that this is completed my agent Angelo Javate at MIQ Logistics Fauna & Flora and Tim McDonald at US Fish and Wildlife Service informed me to file another Form 3-200-21 to reapply for a new permit, along with the form a letter explain that all three trophies were on the same permit MA35878C-0, but were not shipped at the same time. By doing this U.S. Fish and Wildlife Service would issue me a new permit to cover the Altai argali (*Ovis ammon ammon*) that is in the process of getting clearance for shipment to the US.

Please let me know if you require any additional information in order to process my request.

Regards

Robert (b) (6) Facchina

(b) (6)



New  
Application

MAR 23 2018

U.S.  
**Federal Fish and Wildlife Permit Application Form**

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

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES OF ARGALI

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

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

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

**Section C: All applicants complete address information**

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)				
1.b. City New Hope	1.c. State PA	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) (b) (6)				
2.b. City Flemington	2.c. State New Jersey	2.d. Zip code/Postal code (b) (6)	2.e. County/Province	2.f. Country USA

**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 Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) (b) (6) 03/13/2018

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF ARGALI**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** This form should be used only if:

- a. You intend to hunt in Mongolia, the Kyrgyz Republic (Kyrgyzstan), and the Republic of Tajikistan (Tajikistan) that has annual quotas on the take of argali.
- b. Any permits issued will be conditioned that the permit is valid only if, at the port of entry, evidence from the conservation agency in the country of origin is presented showing that the trophy was part of that quota (e.g., copy of hunting license)
- c. If you are hunting in a different country, please use form [3-200-20](#).

**Note 4:**

- a. Complete all questions on the application.
- b. Mark questions that are not applicable with "N/A".
- c. If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.
- d. 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 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below). If you wish expedited delivery, please provide a self-addressed, pre-paid, computer-generated courier service airway bill.

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

Robert [REDACTED] Facchina, (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?

X 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. ENTER the quantity next to the name of Argali subspecies you are applying to import:

Argali (Marco Polo Sheep) (*Ovis ammon poli*)      Quantity: \_\_\_\_\_

Argali (Altai Sheep) (*Ovis ammon ammon*)      Quantity: 1

Argali (Gobi Sheep) (*Ovis ammon darwini*)\*      Quantity:

\*Includes Hangai argali (the Service does not consider this to be a separate subspecies from *O. a. darwini*)

**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 ANIMAL 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 trophy was removed from the wild:

UVS province, Gulzat management area. The nearest city is Ulaangom

- b. Date wildlife was hunted: July 14, 2017 through August 14, 2017
- c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

Hunting Outfitter: Caprinae Safaris, M. Kasapoglu cd. 24/5, 07160 Antalya-TURKEY Tel : +90 242 322 00 27 Fax: +90 242 322 37 70  
Hunting Hunter in Mongolia: MONGOLIAN HIGH MOUNTAIN HUNT™ Co., Ltd, Apt. 20-85, 19th District Khan-Uul Duureg-2 Ulaanbaatar,  
MONGOLIA Tel: 976- 9999 1430 Email: sol\_wrestlers@yahoo.com

- d. 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]:

MONGOLIAN HIGH MOUNTAIN HUNT" Co., Ltd  
Apt. 20-85, 19th District Khan-Uul Duureg-2 Ulaanbaatar, MONGOLIA  
Tel: 976- 9999 1430 Email: sol\_wrestlers@yahoo.com

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 documentation

8. The U.S. Fish and Wildlife Service must make certain determinations under the U.S. Endangered Species Act before an import permit can be issued. If you have information (e.g., recent population surveys of argali in the area where you will hunt/have hunted; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation) that would support our findings, submit this information on a separate page with your application.
9. From which country do you intend to export/re-export the specimen, if different from the country of origin?

**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: 03/13/2018

*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 proposed activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.*

**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).**



## “МОНГОЛИАН ХАЙ МАУНТИН ХАНТ” ХХК

Улаанбаатар, ХУД-2 хороо 19-р хороолол 20-85 тоот  
Утас: 976-9999 1430 Email: alinzol@yahoo.com

2017 оны 9-р сарын өдөр 23

№ 17/09/23

Улаанбаатар хот

### БАЙГАЛЬ ОРЧИН, АЯЛАЛ ЖУУЛЧЛАЛЫН ЯАМНЫ ХҮРЭЭЛЭН БУЙ ОРЧИН, БАЙГАЛИЙН НӨӨШӨН УДИРДЛАГЫН ГАЗАРТ

CITES хүсэх тухай

“Mongolian High Mountain Hunt Co., Ltd.”-аар АНУ-ын иргэн ан агнах  
№ 0170412 тоот тусгай зөвшөөрлийн баримт бичгийн хамгаалалттай газар алслагдсан мөрөн сумын “Гулзат” орон  
нутгийн хамгаалалттай газар алслагдсан тул CITES зөвшөөрөл олгоно уу.

Altai Argali  
Paperwork  
from  
Mongolia

Нэр: Robert (b) (6) FACCHINA

Паспортын дугаар:

(b) (6)

Importer: John Meehan

Brokerage Company: Fauna & Flora Customhouse Brokerage Co., Inc.

Address: 152-31, 135<sup>th</sup> Avenue, Jamaica, NY 11434

Tel: +1 718-977-7700

E-mail: [jimeehan@faunaandflora.com](mailto:jimeehan@faunaandflora.com)

Exporter: Mongolian High Mountain Hunt Co., Ltd  
20-85, 19th District Khan-Uul District-2 Ulaanbaatar, MONGOLIA

Агнасан ан, олзвор: Алтайн угалз: Эвэр, бүтэн арьс, гавал

Компанийн гэрчилгээний хуулбар, ан хийсэн иргэний паспортын хуулбар, ангийн зөвшөөрлийн хуулбар, CITES улсын тэмдэгтийн төлбөр хураамж төлсөн баримтыг хавсаргав.

Хүндэтгэсэн,

“МОНГОЛИАН ХАЙ МАУНТИН ХАНТ” ХХК-ИЙН ЗАХИРАЛ

Н. ТӨГӨЛДӨР

Амгасан 09.08.04 8/8 P. M. 2017

# HUNTING DAILY REPORT

Улс / Country  
USA

Ангийн зуучлагч / Agency  
"Mongolian High Mountain Hunt"

Ймар, Сум / Province, County  
Увс, Бөхморон

Отгийн нэр / Camp  
"GULZAT"



## АГНУУРЫН ӨДӨР ТУТМЫН ТЭМДЭГЛЭЛ

Анчин / Hunter  
ROBERT FACCHINA

Зөвшөөрөл / License  
№ 017 04 12

Орчуулагч / Interpreter  
ALINZOL AMARZAYA

Газарч анчин / Local Guide  
N. ALTANGEREL

Он сар өдөр / Date	Газрын нэр / Location	Угала / Ram	Тоо / Quantity	Зай / Distance (m)	Буудсан зай / Range (m)	Оносон / Hit	Алдсан / Missed
2017. 07. 28	Амгасан урмт, дор	Угала / Ram					
2017. 07. 29	Бүрээс, дор, дор	87	160	—	—	—	
2017. 07. 30	Урмт, дор, дор, дор Урмт, дор, дор, дор	56	16	—	—	—	
2017. 07. 31	Дор, дор, дор, дор	76	210	—	225 м	2	1
2017.							
2017.							
2017.							
2017.							
2017.							
2017.							

Амгасан газрын нэр Бүрээс Н 50, 09.21, 4 E 090, 38.53, 3 h 2403

Амгасан агнуурын төрөл зүйл	Эргийн ургын хэмжээ / Length	Эргийн ур хэмжээ / Base
Угала / Ram	59,5 м	20 м

2017.07.31

Отгийн эрхлэгч / Camp Manager

Ts. Batsukh

Амгасан агнуур Н. Алтангэрэл





МОНГОЛ УЛС

БАЙГАЛЬ ОРЧИН, АЯЛАЛ ЖУУРЧЛАЛЫН ЯАМ  
MINISTRY OF ENVIRONMENT AND TOURISM

Байгаль орчин, аялал жуулчлалын яамны  
2016 оны 04 дүгээр сарын 04 тоот тушаал  
A/27 тоот бусад тоотын дүрэм

АН АГНАХ ТУСГАЙ ЗӨВШӨӨРӨЛ  
SPECIAL HUNTING PERMIT

Дугаар /Permit number/ 0170412

Аймаг /Province/ УВС

Зууллагч байгууллага /Outfitters/ МОНГОЛИАН ХАЙ МАУНТИН  
ХАНТ ХХК

Сум /Sum/ БӨХ МӨРӨН

Амьтан нэр /Name of hunter/ ROBERT (b) (6)  
FACCHINA

Амьд урын бүс нутаг /Hunting area/

ГУЛЗАТ

Улс /Country/ АНУ

Менеджментийг хариуцагч /management authority/

ГУЛЗАТ НАХСРЛАЛУУДИЙН ХОЛБОО

ТББ

Огноогийн өдөр /Issued date/

2017 07 06

Амьд амьтангийн түрлийн нэр, тоо /Game species, quota/

АЛТАЙН (b) (6) ТОЛГОЙ

Тамга /Stamp/

Зөвшөөрлийг олгогчийн  
р/импосс/ issued by  
ХБӨБНУГ-ын дарга

Хуульчил хугацаа /Hunting period/

2017 07.27-наас 2017 08 10 хүртэл

Гарын үсэг  
Signature/

Т.НЯМДАВАА





Department of the  
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit

Original  
Application

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: 1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

T  
IN  
ES OF ARGALI

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 Facchina	1.b. First name Robert	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	
5. Attainment/Doing business as (see instructions)			
6.a. Telephone number (b) (6)	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address

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 New Hope	1.c. State PA	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) (b) (6)				
2.b. City Flemington	2.c. State NJ	2.d. Zip code/Postal code (b) (6)	2.e. County/Province	2.f. Country 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 <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify (b) (6) 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 Chapter 1 of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief, and 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 a person responsible for permit (No photocopied or stamped signatures) _____ Date of signature (mm/dd/yyyy) February 20th 2017	

## E. IMPORT OF SPORT-HUNTED TROPHIES OF ARGALI

- 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 were 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.** This form should be used only if you intend to hunt in Mongolia, the Kyrgyz Republic (Kyrgyzstan), and the Republic of Tajikistan (Tajikistan) that has annual quotas on the take of argali. Any permits issued will be conditioned that the permit is valid only if, at the port of entry, evidence from the conservation agency in the country of origin is presented showing that the trophy was part of that quota (e.g., copy of hunting license). If you are hunting in a different country, please use form 3-200-20 <http://www.fws.gov/international/permits/by-form-number/index.html>.
- Note 3.** Typically the Service receives more applications for permits than we are able to issue. In order to create the most equitable distribution system for issued permits, we have developed a specific procedure for accepting and ranking argali applications. Please see a discussion of this procedure on our website (<http://www.fws.gov/international/permits/by-form-number/index.html>).
- Note 4.** This permit will require a report on your hunt that must be submitted within 30 days of the import of your trophy. If you do not import a trophy you must return the unused permit. No further permits can be issued until this requirement is fulfilled.

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 submit, please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 2 through 6 for each trophy addressed in the application.

1. ENTER the quantity next to the name of Argali subspecies you are applying to import:

Argali (Marco Polo Sheep) ( <i>Ovis ammon poli</i> )	Quantity:	<u>        </u>
Argali (Altai Sheep) ( <i>Ovis ammon ammon</i> )	Quantity:	<u>  1  </u>
Argali (Gobi Sheep) ( <i>Ovis ammon darwini</i> )*	Quantity:	<u>  2  </u>

\*Includes Hangai argali (the Service does not consider this to be a separate subspecies from *O. a. darwini*)

2. Date (MM/DD/YY) wildlife was (or is to be) taken: July 14, 2017 through August 14, 2017
3. **IF THE TROPHY IS ALREADY TAKEN,**
- a. Country and place (e.g., area, region, GIS coordinates, or hunting camp AND nearest city/town) where the argali was taken (provide a map if possible).
- b. A complete description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, horns). The permit will specifically identify all items being imported. This information must also match what appears on the export permit:

- c. The current location of the trophy (address and country):

Name:

Address:

City:

State/Provide:

County, Postal Code:

4. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD,**

- a. Country and place (e.g., area, region, GIS coordinates, or hunting camp, AND nearest city/town) where the argali is intended to be taken. Please be specific and provide a map, if available.

See attached sheet.

- b. A complete description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, horns). The permit will specifically identify all items being imported. This information must also match what appears on the export permit:

Skin, skulls, shoulder mount and life size mounts, horns.

5. From which country do you intend to export/re-export the specimen, if different from the country of origin?  
Mongolia

6. The U.S. Fish and Wildlife Service must make certain determinations under the U.S. Endangered Species Act before an import permit can be issued. If you have information (e.g., recent population surveys of argali in the area where you will hunt/have hunted; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation) that would support our findings, submit this information below or on a separate page with your application.

7. **CERTIFICATION STATEMENT** (original signature must be provided)

I acknowledge that the sport-hunted argali trophy(ies) 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 gain, or benefit).

Applicant's signature: \_\_\_\_\_

Date: 2-20-17

*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 proposed activity. While the Service will attempt to assist where possible, 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 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):

Same as 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): Robert (b) Facchina, (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.

Robert (b) (6) Facchina  
Import of Sport-Hunted Trophies of Argali

Answer to question 4a:

4. IF ANIMAL IS CURRENTLY LIVING IN THE WILD.

- a. Country and place (e.g., area, region, GIS coordinates, or hunting camp, AND nearest city/town) where the argali is intended to be taken. Please be specific and provide a map, if available.

ALTAI Argali: UVS province, Guizat management area. The nearest city is Ulaangom

GOBI Argali: Middle Gobi area. The province is named Dundgobi. The nearest place is Gurvansaikhan. about 350km south of UB.

HANGAI Argali: Dzavkhan province, The nearest city is Shiluustei.





Permit Number: MA35875C-0  
Effective: 08/23/2017 Expires: 08/22/2018

Issuing Office:

Department of the Interior  
U.S. FISH AND WILDLIFE SERVICE  
DIVISION OF MANAGEMENT  
BRANCH OF PERMITS  
5275 LEESBURG PIKE  
FALLS CHURCH VA


Permittee:

ROBERT (b) (6) FACCHINI

(b) (6)

NEW HOPE, PA (b) (6)  
U.S.A.

Original Permit

  
CHIEF, BRANCH OF PERMITS, DMA



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

Authorizations and Conditions:

- Authorized to import, for personal non-commercial use, the sport-hunted trophy taken during the 2017 hunting season (July 1, 2017 to September 30, 2017) of one male Altai argali (*Ovis ammon ammon*) from the High Altai region of Mongolia and two male Gobi argali (*Ovis ammon darwini*) from the Gobi region of Mongolia.
- Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Mongolia for the 2017 season.
- Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit issued by the Management Authority of Mongolia.
- If no trophy is imported, this permit should be returned to the Division of Management Authority on or before the expiration date.
- 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.
- The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law.
- Valid for use by permittee named above.
- Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).



CONVENTION ON  
INTERNATIONAL TRADE IN  
ENDANGERED SPECIES OF  
WILD FAUNA AND FLORA

ЗЭРЛЭГ АМЬТАН БА УРГАМЛЫН АЙМГИЙН  
ХОВОРДСОН ЗҮЙЛИЙГ ОЛОН УЛСЫН  
ХЭМЖЭЭНД ХУДАЛДААЛАХ ТУХАЙ КОНВЕНЦИ


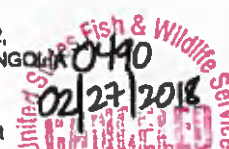
PERMIT / CERTIFICATE № 17/1078

☒ EXPORT  
☐ RE-EXPORT  
☐ IMPORT  
☐ OTHER

Original

2. Valid until  
Хүчинтэй байх хугацаа  
JUN 03, 2018

3. Importer (name and address) Импортлогчийн нэр, хаяг <b>FACCHINA ROBERT</b> <b>(b) (6)</b> <b>(b) (6)</b> <b>U.S.A</b> <b>New Hope, PA (b) (6)</b> <b>(6)</b>	4. Exporter (name and address, country) Экспортлогчийн нэр, хаяг, улсын нэр <b>Jagd &amp; Tour, Ltd</b> <b>Bldg 27-16, 6th khoroо, Bayanzurkh district,</b> <b>Ulaanbaatar, Mongolia</b> <b>Tel: +976-99073068</b>
3a. Country of importer Импортлогч улсын нэр <b>USA</b>	Signature of the applicant Хүсэлт тавигчийн гарын үсэг

5. Special conditions Тусгай нөхцөл  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. Амьд амьтанг агаарын тээвэртэй элэн улсын агаарын тээвэр амьд амьтан тээвэрлэх журмын дагуу, бусад тохиромжтой амьд амьтанг тээвэрлэх тусгай зөвлөмж, нөхцөл, дэглэм, хяналтыг хангасан тохиолдолд төлөөрхөгч өгнө.	6. Name, address, national seal/stamp and country of Management Authority  MINISTRY OF ENVIRONMENT AND TOURISM Government Building #2 United Nations Street 5/2, Ulaanbaatar-15180, MONGOLIA Tel: 976-51-261726 Fax: 976-11-321401 E-mail: mne@mongol.net   
5a. Purpose of the transaction (see reverse) <b>H</b> Худалдааны зорилго	5b. Security stamp № Маркын дугаар <b>1501078</b>


7/8. SCIENTIFIC NAME (genus and species) AND COMMON NAME OF ANIMAL OR PLANT Шинжлэх ууламж (гэрэл зүйл)-ийн болон ерөнхий нэр	9. Description of specimens, including identifying marks or numbers (age/sex if live) Зүйлсийн баарын тодорхойлолт, тэмдэг, амьсга, дугаар (хэрэгт байх үед)	10. Appendix No and source Хэсрэмтийн дугаар, гарал үүсэл	11. Quantity (including unit) Тоо хэмжээ (хэмжээ нэгж)	11a. Total exported/ Quote Экспортын тоо/ Зөвшөөрөгдсөн тоо
A <b>Capra sibirica</b> <b>/Siberian Ibex/</b>	<b>Skull/ skin</b> <b>and horns</b>	<b>W - III</b>	<b>Pair</b>	<b>- 1 -</b> <b>/ONE/</b>
B <b>==NO==</b>	<b>==NO==</b>	<b>==NO==</b>	<b>==NO==</b>	<b>==NO==</b>
C <b>==NO==</b>	<b>==NO==</b>	<b>==NO==</b>	<b>==NO==</b>	<b>==NO==</b>
12 Country of origin * Эхлэл тээвэрлэгчийн улсын нэр	Permit No Зөвшөөрлийн №	Date Огноо	12a Country of first re-export Хэвлэлд оруулсан улсын нэр	Certificate No Зөвшөөрлийн №
				Date Огноо
			12b Number of the operation ** or date of acquisition *** Үйл ажиллагааны дугаар ** эсвэл өмчлөхний өдөр ***	


\* Country in which the specimens were taken in the wild, bred in captivity or artificially propagated (only in case of re-export)  
Зүйлсийн баарын тоо хэмжээ, тэмдэг, амьсга, дугаар (хэрэгт байх үед) (зөвхөн эхлэл тээвэрлэгчийн улс)

\*\* Only for specimens of Appendix-I species bred in captivity or artificially propagated for commercial purposes  
Зөвхөн I-дүрсний амьтан, зүйлсийн баарын тоо хэмжээ, тэмдэг, амьсга, дугаар (хэрэгт байх үед) (зөвхөн эхлэл тээвэрлэгчийн улс)



\*\*\* For pre-convention specimens  
Конвенци өмчлөхний өдөр эхлэл тээвэрлэгчийн улс

13. THIS PERMIT IS ISSUED BY:  
Зөвшөөргүй, бичигт өгсөн

  
**1501078**  
**Ulaanbaatar**  
Place  
Огноо

  
**NYAMDAAVA G, Head of CITES**  
**Management Authority of Mongolia**  
**DEC 04, 2017**  
Date  
Огноо

14. EXPORT ENDORSEMENT Хэрэгт тэмдэг, амьсга, дугаар	15. Date of signature Огноо
A <b>Skull, skin, horns</b>	<b>Buyant - ulukha 2018 02.01</b>
B	
C	



CONVENTION ON  
INTERNATIONAL TRADE IN  
ENDANGERED SPECIES OF  
WILD FAUNA AND FLORA

ЗЭРЛЭГ АМЬТАН БА УРГАМЛЫН АЙМГИЙН  
ХОВОРДСОН ЗҮЙЛИЙГ ОЛОН УЛСЫН  
ХЭМЖЭЭНД ХУДАЛДААЛАХ ТУХАЙ КОНВЕНЦИ

PERMIT / CERTIFICATE № 17/1075

☒ EXPORT  
☐ RE-EXPORT  
☐ IMPORT  
☐ OTHER

Original

2. Valid until  
Хугацааг байх хугацаа  
JUN 03, 2018

3. Importer (name and address) Импортлогчийн нэр, хаяг <b>FACCHINA ROBERT (b) (6)</b> <b>(b) (6)</b> New Hope, PA <b>(b) (6)</b> U.S.A	4. Exporter (name and address, country) Экспортлогчийн нэр, хаяг, улсын нэр <b>Jagd &amp; Tour, ltd</b> <b>Bldg 27-16, 6th khoroo, Bayanzurkh district,</b> <b>Ulaanbaatar, Mongolia</b> <b>Tel: +976-99073068</b>
3a. Country of importer Импортлогч улсын нэр <b>USA</b>	Signature of the applicant Хүсэлт тавигчийн гарын үсэг

5. Special conditions Тусгай нөхцөл  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. Амьд амьтанг агаарар тээвэрлэхэд эргэн улсын агаарар амьд амьтан тээвэрлэх журмын дагуу, бусад тасламттай амьд амьтан тээвэрлэх тусгай зааварын нөхцөлийг хангасан тээвэрлэлт, зориолсон байна.	6. Name, address, national seal/stamp and country of Management Authority  MINISTRY OF ENVIRONMENT AND TOURISM Government Building #2 United Nations Street 5/2, Ulaanbaatar-15180, MONGOLIA Tel: 976-51-261726 Fax: 976-11-321401 E-mail: mns@mongol.net
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7/8. SCIENTIFIC NAME (genus and species) AND COMMON NAME OF ANIMAL OR PLANT Шинжлэх ухааны (гэрлэг зүйл)-ын болон өрөнхий нэр		9. Description of specimens, including identifying marks or numbers (age/sex if live) Зүйлсийн бүтэц/хүрээлэл/хэргийн, төлөг, өмнө, дугаар (хэрэг үзвэл багц нэвчлэл)	10. Appendix No and source Хавсралтын дугаар, гарал үүсэл	11. Quantity (including unit) Тоо хэмжээ (хэмжээ хэмжээ)	11a. Total exported/ Quota Экспортын тоо/ Засварлагдсан тоо
A	Ovis ammon darwini /Khangai argali/	Skull/ skin and horns	W - II	Pair	- 1 - /ONE/
B	==NO==	==NO==	==NO==	=NO=	=NO=
C	==NO==	==NO==	==NO==	=NO=	=NO=

12. Country of origin * Эхлэлт экспортын улсын нэр *	Permit No Засварлагдсан дугаар	Date Он сар өдөр	12a. Country of last re-export Хамгийн сүүлд ре-экспортын улсын нэр	Certificate No Засварлагдсан дугаар	Date Он сар өдөр	12b. Number of the operation ** or date of acquisition *** Үйл ажиллагааны дугаар ** эсвэл ойн эзэмшлэн хугацаа ***
---	-----------------------------------	---------------------	--	--	---------------------	--

\* Country in which the specimens were taken from the wild, bred in captivity or artificially propagated (only in case of re-export)  
Зүйлсийн биеийг нь лавар авчирсан газартай, тархин агаар гаргуулагдсан, тархин агаар (эсвэл ре-экспортын тэмдэг)

\*\* Only for specimens of Appendix-I species bred in captivity or artificially propagated for commercial purposes  
I-хавсралтад өрсөн зүйлсийн биеийг эрсдэл гаргуулагдсан, тархин агаар гаргуулагдсан зүйлсийн зориулалтаар гаргуулагдсан тэмдэг

\*\*\* For pre-convention specimens  
Конвенцийг эхлээд өмнө ойн эзэмшлэн /зүйлсийн биеийг

13. THIS PERMIT IS ISSUED BY:  
Засварлагдсан бичиг барих:

**Ulaanbaatar**  
Place  
Огносон газар

**NYAMDAAVA G, Head of CITES**  
**Management Authority of Mongolia**  
**DEC 04, 2017**  
Date  
Он сар өдөр

14. EXPORT ENDORSEMENT Хүн, газартай байгуулалын хэргийн зориолсон	15. Bill of Lading/Air Waybill Number Агаарын бичигт /Агаарын дугаар
Block Блок	Quantity Тоо хэмжээ
(A) 3	skull, sex, horn
C	

Buyout - check 2018.02.01  
Port of origin  
Эхлэлт газар

Signature  
Гарын үсэг

Official stamp and title  
Тамга






**ЗЭРЛЭГ АМЬТАН БА УРГАМЛЫН АЙМГИЙН  
ХОВОРДСОН ЗҮЙЛИЙГ ОЛОН УЛСЫН  
ХЭМЖЭЭНД ХУДАЛДААЛАХ ТУХАЙ КОНВЕНЦИ**

<input checked="" type="checkbox"/>	EXPORT
<input type="checkbox"/>	RE-EXPORT
<input type="checkbox"/>	IMPORT
<input type="checkbox"/>	OTHER

**Original**

2. Valid until  
Хүчинтэй байх хугацаа  
JUL 04 2018

3. Importer (name and address) Импортлогчийн нэр, хаяг <b>ROBERT (b) FACCHINA</b> <b>(b) (6)</b> <b>(b) (6)</b> <b>New hope, PA (b) (6)</b>		4. Exporter (name and address, country) Экспортлогчийн нэр, хаяг, улсын нэр <b>BT&amp;TC Co.,ltd</b> <b>37/17 3th khoroo, Sukhbaatar district,</b> <b>Ulaanbaatar, Mongolia</b> <b>Tel: +976-99080061, 77070061</b>											
3a. Country of importer Импортлогч улсын нэр <b>USA</b>		Signature of the applicant Хувиат тээврийн гарын үзэр											
5. Special conditions Тусгай нөхцөл  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. Амьд амьтанг агаарын тээврийгээр өндөг, үхсэн, элэг рээр агаарын тээврийн дутуу, буцад тогтмол нөхцөлд зориулж тээвэрлэх үйлдлийн хугацааг хамгаалж тээврийн хэрэгсэл хэрэглэнэ.		6. Name, address, national seal/stamp and country of Management Authority  <b>MINISTRY OF ENVIRONMENT AND TOURISM</b> <b>Government Building #2</b> <b>United Nations Street 5/2,</b> <b>Ulaanbaatar-15160, MONGOLIA</b> <b>Tel: 976-51-281726</b> <b>Fax: 976-11-321401</b> <b>E-mail: mne@mongol.net</b>											
5a. Purpose of the transaction (see reverse) <b>H</b> Худалдааны зорилго		5b. Security stamp № Марьяны дугаар <b>1501092</b>											
7/8. SCIENTIFIC NAME (genus and species) AND COMMON NAME OF ANIMAL OR PLANT Шинжлэх ургамал (төрөл зүйл)-ын болон ерөнхий нэр		9. Description of specimens, including identifying marks or numbers (age/sex if live) Эмгэгдлийн дүрвэл, тэмдэг, хувиат (хэрэгсэл хэрэгсэл хэрэгсэл)		10. Appendix No and source Хавсралтын дугаар, гарын үзэг		11. Quantity (including unit) Тоо хэмжээ (хэмжээ нэгж)		11a. Total exported/ Quota Экспортын тоо/ Зөвшөөрөгдсөн тоо					
A <b>Ovis ammon darwini</b> <b>/Gobi argali/</b>		Skull/ skin and horns		W - II		Pair		- 1 - /ONE/					
B <b>NO</b>		<b>NO</b>		<b>NO</b>		<b>NO</b>		<b>NO</b>					
C <b>NO</b>		<b>NO</b>		<b>NO</b>		<b>NO</b>		<b>NO</b>					
12. Country of origin * Ургамал гаралтай улс		Perm. No Хувиат дугаар		Date Огноо		12a. Country of last export Хувиат дугаар		Certificate No Хувиат дугаар		Date Огноо		12b. Number of the operation ** or date of acquisition *** Үйлдлийн тоо эсвэл эзэмшлээний өдөр ***	
* Country in which the specimens were taken from the wild, bred in captivity or artificially propagated (only in case of re-export) Эмгэгдлийн гаралтай улс, эсвэл эзэмшлээний өдөр, эсвэл эзэмшлээний өдөр (зөвхөн хувиат дугаар хэрэгсэл) ** Cry for specimens of Appendix I species bred in captivity or artificially propagated for commercial purposes *** For pre-Convention specimens													
13. THIS PERMIT ISSUED BY Зөвшөөрөгдсөн хувиат дугаар													
 <b>NYAMDAVAA G, Head of CITES</b> <b>Management Authority of Mongolia</b> <b>JAN 05, 2018</b> Date Огноо													
14. EXPORT ENDORSEMENT Экспортын дугаар													
 <b>Ulaanbaatar</b> Place Огноо													
15. EXPORT ENDORSEMENT Экспортын дугаар													
 <b>Ulaanbaatar</b> Place Огноо													

U.S. FISH AND WILDLIFE  
SERVICEDECLARATION FOR  
IMPORTATION  
OR EXPORTATION OF  
FISH OR WILDLIFE

1. Date of Import/Export (mm/dd/yyyy):  
02/09/2018

2. Import/Export License Number:  
\*\*\*\*\*

3. Indicate One:  
☒ import ☐ export

4. Port of Clearance:  
NY

5. Purpose Code:  
H

6. Customs Document Number(s):  
988-056711991

7. Name of Carrier:  
TURKISH AIRLINES

8. Air Waybill or Bill of Lading No.:  
Master: 235-67575944  
House: cs03021802

9. Transportation Code: A

License No.  
State or Province:

10. Bonded Location for Inspection:  
F631/MIQ

11. Number of Cartons Containing Wildlife:  
1

12. Markings on Cartons Containing  
Wildlife: SJFKIA04056

13. (indicate one)  
☒ U.S. Importer  
☐ U.S. Exporter  
ROBERT FACCHINA  
(b) (6)  
NEW HOPE, PA (b) (6)  
9087882288

14. (indicate one)  
☐ Foreign Importer  
☒ Foreign Exporter  
JAGD AND TOUR LLC  
27-16 BLD 6TH HKOROO BAYANZURKH DISTRICT  
ULAANBAATAR, MN

13b. Identifier Number: ID Type:

14c. Identifier Number: ID Type:

15. Customs Broker, Shipping Agent or Freight Forwarder:  
Fauna & Flora

15b. Identifier Number: ID Type:

Phone Number / Fax Number / Email Address:  
7184815405 / 7187237741 / angelo.javate@miq.com

15c. Contact Name: Angelo Javate

Species Code	16a. Scientific Name 16b. Common Name	17a. Foreign CITES Permit Num. 17b. U.S. CITES Permit Num.	18a. Description Code 18b. Source	19a. Quantity/Units 19b. Total Monetary Value	20. Country of Species Origin Code (ISO Code)	21. Venomous Live Wildlife Indicator
OAMD	OVIS AMMON DARWINI ARGALI	17/1075	TRO W	1.00 NO \$ 2,600	MN	<input type="checkbox"/>
CAPS	CAPRA SIBIRICA SIBERIAN IBEX	17/1078	TRO W	1.00 NO \$ 700	MN	<input type="checkbox"/>
						<input type="checkbox"/>
						<input type="checkbox"/>

Knowingly making 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:  
Filed Electronically 02/15/2018 - Confirm Num: 2018NY2182751  
Fee Total - CorporateID C107 : \$93.00

Action/Comments:

Wildlife Declared

Wildlife Inspected: None

Service K-9 Utilized: No

Inspected By: Greenwood, WI0490

Dec Control Num: 2018311996

U S F I S H & W I L D L I F E S E R V I C E  
N I T E D  
*Electronic Filing*  
**CLEARED**  
T A T E S

Date: 02/27/2018

311996



U.S. FISH AND WILDLIFE  
SERVICEDECLARATION FOR  
IMPORTATION  
OR EXPORTATION OF  
FISH OR WILDLIFE

1. Date of Import/Export (mm/dd/yyyy): 02/09/2018
2. Import/Export License Number: *****
3. Indicate One: <input checked="" type="checkbox"/> import <input type="checkbox"/> export
4. Port of Clearance: NY
5. Purpose Code: H
6. Customs Document Number(s): 988-05671983

7. Name of Carrier: TURKISH AIRLINES
8. Air Waybill or Bill of Lading No.: Master: 235-67575944 House: CS03021801
9. Transportation Code: A  License No. State or Province:
10. Bonded Location for Inspection: F631/MIQ
11. Number of Cartons Containing Wildlife: 1
12. Markings on Cartons Containing Wildlife: SJFKIA04055

13. (indicate one) <input checked="" type="checkbox"/> U.S. Importer  <input type="checkbox"/> U.S. Exporter  ROBERT FACCHINA (b) (6) NEW HOPE, PA (b) (6) (b) (6)	14. (indicate one) <input type="checkbox"/> Foreign Importer  <input checked="" type="checkbox"/> Foreign Exporter  BT&TC CO LTD SUKHBAATAR DISTRICT 3TH KHOROO 37-17 ULAANBAATAR, MN
13b. Identifier Number: ID Type:	14c. Identifier Number: ID Type:
15. Customs Broker, Shipping Agent or Freight Forwarder: Fauna & Flora	15b. Identifier Number: ID Type:
Phone Number / Fax Number / Email Address: 7184815405 / 7187237741 / angelo.javate@miq.com	15c. Contact Name: Angelo Javate

Species Code	16a. Scientific Name 16b. Common Name	17a. Foreign CITES Permit Num. 17b. U.S. CITES Permit Num.	18a. Description Code 18b. Source	19a. Quantity/Units 19b. Total Monetary Value	20. Country of Species Origin Code (ISO Code)	21. Venomous Live Wildlife Indicator
OAMD	OVIS AMMON DARWINI ARGALI	18/1092	TRO W	1.00 NO \$ 9,000	MN	<input type="checkbox"/>
						<input type="checkbox"/>
						<input type="checkbox"/>
						<input type="checkbox"/>

Knowingly making 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  
Filed Electronically 02/15/2018 - Confirm Num: 2018NY2182758  
Fee Total - CorporateID C107 : \$93.00

Action/Comments:
Wildlife Declared
Wildlife Inspected: None
Service K-9 Utilized: No
Inspected By: Greenwood, WI0490

Dec Control Num: 2018313745

U FISH & WILDLIFE SERVICE S  
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Date: 03/02/2018

313745





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

OMB No. 1018-0164  
Expires 11/30/2016

**Federal Fish and Wildlife Permit Application Form**

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

Type of Activity:  
**Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

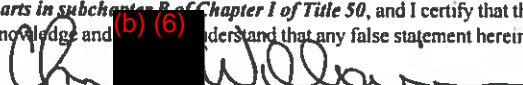
MAR 23 2018

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 Williams	1 b. First name Christopher	1 c. Middle name or initial (b) (6)	1 d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Occupation (b) (6)		
4. Affiliation/ Doing business as (see instructions) n/a			
5 a. Telephone number (b) (6)	5 b. Alternate telephone number (b) (6)	5 c. Fax number (b) (6)	5 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 Anniston	1 c. State AL	1 d. Zip code/Postal code: (b) (6)	1 e. County/Province	1 f. Country USA	
2 a. Mailing Address (include if different than physical address, include name of contact person if applicable)					
2 b. City	2 c. State	2 d. Zip code/Postal code:	2 e. County/Province	2 f. Country	

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter 1 of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and understanding and that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature of applicant/person responsible for permit (No photocopied or stamped signatures)	
Date of signature (mm/dd/yyyy) 03/11/2018	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: n/a (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: 1 (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: n/a (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

n/a

3. **IF THE ANIMAL IS DEAD**, please enter the following:

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

- b. Date wildlife was hunted: Maremiani Singelele Nature Reserve, Musina, South Africa  
May 12, 2016

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

(2) tusks, (2) ears prepared for decorative painting, tail with mounting hardware, (2) skin panels, 4 feet (2 to made into stools) and (2 to made into trash cans).

- 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]:

Safari Taxidermy  
47 Goud St., Laboria, Polokwane, RSA

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 appear on the face of the export permit].

Name: Business      Safari Taxidermy  
Name: Address:      PO Box 235, Ladanna, 0704  
Address:              47 Goud St., Labotia,  
City:                   Polokwane  
State/Province:      Limpopo  
Country, Postal Code: Republic of South Africa  
                                 0704

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

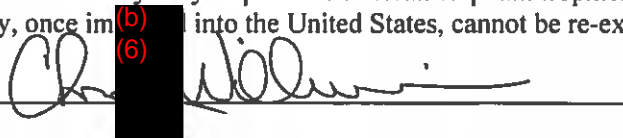
**Taxidermist/Broker's signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_



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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:



Date: 3/11/18

*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.*

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 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):

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.

VMU 35/2016



# ORDINARY PERMIT

PERMIT NUMBER: O N<sup>o</sup> 13970

(Issued in terms of the provisions of the  
National Environmental Management  
Biodiversity Act 2004, Act 10 of 2004)

NAME	Environmental Affairs
ADDRESS	Musing
PROVINCE	Limpopo

DETAILS OF PERMIT HOLDER	
NAME	Mr Christopher (b) (6)
SURNAME	Williams
POSTAL ADDRESS	
RESIDENTIAL ADDRESS	
ADDRESS	
ADDRESS	(b) (6)
ADDRESS	
TOWN	Anniston, AL
POSTAL CODE	(b) (6)
PROVINCE	USA

ns

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT	
NAME AND SURNAME OF APPLICANT	Mr Petrus Cornelius Jansen
NAME AND SURNAME, RESPONSIBLE PERSON	Mr Piet Jansen
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	
PHYSICAL ADDRESS OF FACILITY	
DISTRICT	Vhembe
PROVINCE	Limpopo
REGISTERED NAME AND NUMBER (in the case of game farm)	Mareman's Nature Reserve

25

DETAILS OF SPECIES INVOLVED			
SPECIES	SEX	QUANTITY	MARKING
COMMON NAME	(if known)		(if applicable)
African Elephant	Male	1 (one)	
SCIENTIFIC NAME			
Loxodonta			
afriicana			

DETAILS OF RESTRICTED ACTIVITIES INVOLVED	
To hunt one elephant bull, during the day with a rifle. Lusk must be marked at the local Environmental office before they are conveyed to a taxidermy.	

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)	Mr Christopher Shawn Williams
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	Mr P Jansen
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	Mr P Jansen
WEAPON AND METHOD OF HUNTING	Rifle, walk and stalk

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:	
WEIGHT OF EACH PIECE APPLIED FOR	7,5 + 8,0 kg
LENGTH OF THE ELEPHANT IVORY	96,0 + 90,0 cm
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	33,0 + 33,0 cm
REGISTRATION NUMBER	ZA 16 2219 7,5 LP + ZA 16 2220 8,0 LP
MICROCHIP NUMBER	19/07/16

PERMIT VALIDATION	
PERIOD OF VALIDITY	FROM: 10/05/2016 TO: 10/05/2016
RECEIPT NUMBER	1078520
SIGNATURE OF ISSUING OFFICER:	SIGNATURE OF PERMIT HOLDER:
DATE STAMP:	2016-05-05
WILDLIFE TRADE REGULATION	

# SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

Duration of Hunt

Commenced 07, 05, 2016 Terminated 18, 05, 2016

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



A. LP No 081096

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Limpopo Province (LP) <input checked="" type="checkbox"/>	North West (NW)	Mpumalanga (MPA)	Western Cape (CNC)	Eastern Cape (EC)	Northern Cape (NC)
---------------------	-----------------	--------------	---	-----------------	------------------	--------------------	-------------------	--------------------

POST PERMIT TO (Mark correct block with X)

PROFESSIONAL HUNTER			CLIENT			HUNTING OUTFITTER		
Name	P JANSEN		Name	Christopher Williams		Name	PC JANSEN	
Business Address	EAST CRESCENT MUSINA 0900		Permanent Postal Address	ANNISTON, AL		Business Address	EAST CRESCENT MUSINA Code 0900	
ID No	8103155035086		Code	Country U.S.A		ID No	5905265008081	
PH Permit No	0098 CPM 401-01-277		Passport No			Tel No	0155340207 Fax No -	
Date	18/05/2016 Signature Jansen		Tel/Fax			HO Permit No	219/LP/75275	
Date	18/05/2016 Signature Jansen		Date	18/05/2016 Signature Williams		Date	18/05/2016 Signature Jansen	

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No	Date of Hunt		Species Killed or Wounded	Number Killed or Wounded	Sex		Part of Trophy to be Exported
				From	To			F	M	
SMAREMAN Singelhe nature Reserve MT6	MUSINA	PC JANSEN PO. Box 1225 MUSINA 0900	013976	07/05/2016	18/05/2016	ELEPHANT	1			TUSKS x2 FEET x4 EARS x2 TAIL SKIN

Copies Client Original

	1st copy	Forward to Nature Conservation authority where hunt took place
Hunting Outfitter	2nd copy	Retain for a period of three years
Professional Hunter	Last copy	Remains in book

Address to which trophies are to be sent

Country Trophy Export Date (Estimate)



MAR 23 2018



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

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

Type of Activity

**Import of Sport-hunted Trophies of Southern  
African Leopard and Namibian Southern White  
Rhinoceros**

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 <b>SCHLIDT</b>	1.b. First Name <b>ERIC</b>	1.c. Middle Name/Initial <b>(b) (6)</b>	1.d. Suffix <b>(b) (6)</b>
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number <b>(b) (6)</b>	3.a. Alternate Telephone Number <b>(b) (6)</b>	4. E-mail Address <b>(b) (6)</b>

**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 #		3. Description of business, agency, Tribe, or institution	
4.a. Principal office location	4.b. Principal office P.O. Box	4.c. Principal office Middle Name/Initial	4.d. Suffix
5. Business address		6. Primary contact name	
7.a. Business address	7.b. Business address	7.c. Business address	7.d. Business address

**Section C: All applicants complete address information**

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes) <b>(b) (6)</b>				
1.b. City <b>Casper</b>	1.c. State <b>WY</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province <b>(b) (6)</b>	1.f. Country <b>USA</b>
2.a. Mailing address (Include if different than physical address; include name of company) <b>(b) (6)</b>				
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)
Please continue to next page



**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND  
NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit to the address on page one.**

**Note 2:** 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:** *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 4:** Certain hunting trophies, including leopard 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.

- **Complete all questions on the application.**
- **Mark questions that are not applicable with "N/A".**
- **If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.**
- **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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):
- a. Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20.
  - b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia  
Quantity:        (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).
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 ANIMAL HAS ALREADY BEEN TAKEN, please enter the following:

- d. 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:

Dande Safari Area | Mushumbi Pools, Guruwe | Zimbabwe | 014295

- e. Date wildlife is to be hunted:

July 3, 2017

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

Charlton McCallum Safaris

- g. 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 (TCI)  
4 Josiah Chinamo Rd  
Belmont  
Belunyo 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.
- a. 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 Lewis  
Business Name: CopperSmith Global Logistics  
Address: 760 Bonnie Lane  
Address:  
City: Elk Grove  
State/Province: IL  
Country, Postal Code: USA, 60007

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. 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: \_\_\_\_\_

10. 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: 3/14/18

*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.*

11. 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).





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

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March 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<sup>2</sup> 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](mailto:jjj@conservationforce.org)  
[www.conservationforce.org](http://www.conservationforce.org)

**NOTICE OF REPRESENTATION**

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

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

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

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

Signed: David Turner

Name: David (b) (6) Turner

Date: 3/13/2018



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

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

RCVD MAR 27 2011

**Federal Fish and Wildlife Permit Application Form**

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

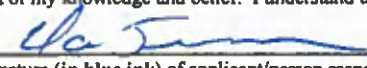
**Type of Activity:**  
**IMPORT OF SPORT-HUNTED TROPHIES**  
(Appendix I of CITES and/or ESA)

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

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

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

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

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

*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):  
David W. Turner  
(b) (6)
12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?
- ☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

**PRIVILEGED, PROPRIETARY,  
CONFIDENTIAL INFORMATION**

**NOT FOR PUBLIC RELEASE**



























































# 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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† BERT KLINEBURGER

BOARD OF DIRECTORS:  
JOHN J. JACKSON, III, J.D.  
CHRISSE 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 km<sup>2</sup> 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](mailto:jjj@conservationforce.org)  
[www.conservationforce.org](http://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 elephant trophy. *+ 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<sup>15</sup> 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: *Samuel Cunningham* (b) (6)

Name: Samuel (b) (6) Cunningham

Date: 03/19/2018



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: 1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

Type of Activity:

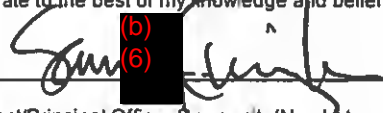
**IMPORT OF SPORT-HUNTED TROPHIES  
(Appendix I of CITES and/or ESA)**

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 Cunningham	1.b. First name Samuel	1.c. Middle name or initial (b) (6)	1.d. Suffix na
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 Amarillo	1 c. State Texas	1 d. Zip code/Postal code: (b) (6)	1 e. County/Province	1 f. Country USA
2 a. Mailing Address (include if different than physical address; include name of contact person if applicable) same				
2 b. City same	2 c. State same	2 d. Zip code/Postal code: same	2 e. County/Province same	2 f. Country 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 – <b>attach documentation of fee exempt status as outlined in instructions.</b> (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](mailto: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.

na

4. For each trophy to be imported, provide:

- a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Loxodonta africana (African elephant)

- 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, Mfuwe Region, Mwanya GMA, Mfuwe Town and Mwanya

- b. Date wildlife is to be hunted: October 2-18, 2018

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

WH van Noordwyk, Mvuu 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 Cockcroft  
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

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: 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).**



# 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.  
CHRISSE JACKSON  
PHILIPPE CHARDONNET, D.V.M.  
SHANE MAHONEY  
RENEE SNIDER

March 22, 2018

ROUD 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<sup>2</sup> 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.
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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](mailto:jjj@conservationforce.org)  
[www.conservationforce.org](http://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: Name: Wright (b) (6) Dr. BrulDate: 3/10/18



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

RCVD MAR 27 2018

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 Van Brunt	1.b. First name Dwight	1.c. Middle name or initial (b) (6)	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 Kalispell	1.c. State MT	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 -- <b>attach documentation of fee exempt status as outlined in instructions.</b> (50 CFR 13.11(d))	
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in <b>Title 50, Part 13 of the Code of Federal Regulations</b> 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](mailto: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 - 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:

City:

State/Province:

Country, Postal Code:

Jamy Traut Hunting SAFARIS  
Farm GRAVENSTEIN 65  
Windhoek, Namibia 9000

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, (b) (6) 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).**



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](mailto:info@kalaharigamelodge.com.na) | Web: [www.kalaharigamelodge.com.na](http://www.kalaharigamelodge.com.na)  
Physical Address: Route C15, Mata-Mata, Karas Region, Namibia

Direkteure / Directors: D.B. 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](mailto:info@kalaharigamelodge.com.na) | Web: [www.kalaharigamelodge.com.na](http://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 its 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







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

OMB No. 1018-0164  
Expires 11/30/2016

**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 of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros

RCVD JAN 04 2018

LB

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

A. Complete if applying as an individual			
1.a. Last name Pulliam	1.b. First name Larry	1.c. Middle name or initial [REDACTED]	1.d. Suffix
2. Date of birth (mm/dd/yyyy) [REDACTED]	3. Occupation [REDACTED]	4. Affiliation/ Doing business as (see instructions) N/A	
5.a. Telephone number [REDACTED]	5.b. Alternate telephone number N/A	5.c. Fax number N/A	5.d. E-mail address [REDACTED]

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

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

D. All applicants MUST complete	
1. <input checked="" type="checkbox"/> 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-13.14(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature of applicant person responsible for permit (No photocopied or stamped signatures) <u>Larry Pulliam</u> Date of signature (mm/dd/yyyy) <u>12/30/17</u>	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: 0 (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: 0 (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

N/A

3. **IF THE ANIMAL IS DEAD**, please enter the following:

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

Farm Maamlig no 904, Otjizondjupa, (GIS= 19' 0'41,65" S -18' 58'52,79" E)

- b. Date wildlife was hunted: Grootfontein, Namibia  
9/12/2017 date hunted

- 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, Life Size Mount, 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 document]:

Farm Maamlig no 904  
PO Box 462 Grootfontein, Namibia  
Pieter Gerhouse Luttig, ID 73030600521

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 appear on the face of the export permit].

Name: Business      Pieter Gerhardus Littug  
Name: Address:      Mannlig Hunting Farm  
Address:              P.O. Box 462 Grootfontein, 9000  
City:                  Grootfontein  
State/Province:      Otjizondjupa  
Country, Postal Code: Namibia  
                                 90009

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. ~~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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: \_\_\_\_\_

*Larry Pulliam*

Date: 12/30/17

*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.*

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 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):

N/A mail to same

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):  
Larry Pulliam, 713-927-5984, lpulliam5984@gmail.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.





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


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

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

**Section C: All applicants complete address information**

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; or P.O. Box) <b>(b) (6)</b>				
1.b. City <b>EDMOND</b>	1.c. State <b>OK</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>
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)  <b>03/15/2018</b>
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.

N/A

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

TARIQ SATTAR,

(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.

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:

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: GWAEI SMALL SCALE FARMERS ASSOCIATION

LOCATION STATS: S 19° 12' 58.3"

E 027° 49' 33.1"

b. Date wildlife was hunted:

NEAREST CITY: BULAWAYO

3/30/2016

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

WAYNE VAN DEN BERGH (PH & OUTFITTER)  
NYAMAZANA SAFARIS  
BULLAWAYO, 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 export/re-export document]:

TAXIDERMY ENTERPRISES  
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).
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: TAXIDERMY ENTERPRISES  
Business Name: MARINA BURGESS  
Address: 4 JOSIAH CHINAMANO ROAD  
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?

POPULATION IS GROWING

- 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?

BULK OF THE FUNDS WERE PAID TO  
THE LOCAL COMMUNITY TO SUPPORT AND  
IMPROVE LOCAL LIVING CONDITIONS AND ENHANCE  
LEGAL HUNTING ACTIVITIES.

- 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/A



**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: \_\_\_\_\_




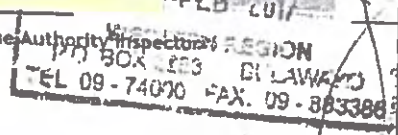
11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

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: 3/15/18

*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>CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA</b>		Permit/Certificate No <b>ZW/4106/2017</b>		Original	
3. Importer (name and address): <b>MR TARIQ SATTAR</b>		4. Exporter (name, address and country Zimbabwe) <b>TAXIDERMY ENTERPRISES 4 JOSIAH CHINAMANO ROAD BELMONT BULAWAYO ZIMBABWE</b>		2. Valid Until: <b>31-07-2017</b>	
3a. Country Of Import		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		6. Name, address, stamp and country of Management Authority  <b>Zimbabwe Parks and Wildlife Management Authority</b>	
5a. Purpose of transaction (see reverse) <b>H</b>		5b. Security stamp no. <b>1295829</b>			
6a. Declaration by Exporter or Agent I hereby declare that I am aware of the provision of the Convention Statutory Instrument 76 of 1998, for the purpose of Exporting / Importing the Wildlife listed below. The total value of this consignment is: <b>SUS</b> ..... Signature of applicant					
7. Scientific Name	8. Common Name	9. Description of specimens including no. (age/sex if listed)			
<i>Loxodonta africana</i>	Elephant	skin pieces : panels leather tan cut into			
<i>Loxodonta africana</i>	Elephant	skin scraps : leather			
<i>Loxodonta africana</i>	Elephant	talls :			
<i>Loxodonta africana</i>	Elephant	tusks : capped in ni			
<i>Loxodonta africana</i>	Elephant	tusks : capped in ni			
11c. Mark 2016- n/a 2016- n/a 2016- n/a 2016- ZW2016 23013 14 2016- ZW2016 23014 14					
12. Country of origin:		Permit No	Date		
13. This permit is issued by Place: Bulawayo  Date: <b>31-01-2017</b>					
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 Inspector 			
16. Export endorsement:		17. Bill of lading/Air waybill number:			
Specimens	Quantity	Specimens	Quantity		
Port of export				Date	Signature

THIS IS AN EXPIRED  
PERMIT FROM LAST YEAR  
AND WILL BE REISSUED  
AFTER AN IMPORT  
PERMIT HAS BEEN  
ISSUED BY USFWS.

THANKS

TARIQ SATTAR

(b) (6)





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: 1A  
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 <b>WRITER</b>	1 b. First Name <b>ADAM</b>	1 c. Middle Name/Initial <b>(b) (6)</b>	1 d. Suffix
2. Address <b>(b) (6)</b>	3 a. Alternate Telephone Number	4. E-mail address <b>MATT@GENUSCIBISTICS.COM</b>	

## 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>(b) (6)</b>				
1 b. City <b>ENGLEWOOD</b>	1 c. State <b>CO</b>	1 d. Zip code/Postal code <b>(b) (6)</b>	1 e. County/Province	1 f. Country <b>US</b>
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) <b>[Signature] 3/28/18</b>
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.

**GENUS LOGISTICS INC.**

161-15 Rockaway Blvd st 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. 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.

b. Sex (if known).

MALE, ELEPHANT / LOXODONTA AFRICANA

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:

NAMIBIA, Unkwatundu: Henty Conservancy

b. Date wildlife was hunted:

07/29/2014



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

S. M. JACOBS

- 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.O. BOX 601

GROOTFONTEIN, NAMIBIA

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:

S. M. JACOBS

Business Name:

Address:

P.O. BOX 601

City:

State/Province:

GROOTFONTEIN

Country, Postal Code:

NAMIBIA

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: 3/28/18

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).

# Genus Logistics Inc.

16115 Rockaway Blvd STE 205 Jamaica NY 11434

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

Individual U.S. Customs Service Individual IRS / SS #

(b) (6)

☒ Individual

☐ Partnership

Partnership 141.32. C.R.

☐ Corporation

☐ Sole Proprietorship

## CUSTOMS POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS: That, Adam (b) (6) Writer (Full Name of person, partnership, corporation, or sole proprietorship (Identify)) (b) (6) doing business under the laws of the State of, (b) (6) or a (b) (6) doing business as Englewood CO (b) (6) residing at (b) (6) having an office and place of business at (b) (6) hereby

constitutes and appoints each of the following persons Genus Logistics Inc.

may act through any of its offices 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 consigned 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 filling 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 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 at the customhouses in said district any and all customs business, including making, signing, and filling of protests under section 514 of the Tariff Act of 1930. In 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 forgoing 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 power shall in no case have any force or effect after the expiration of 2 years from the date of its execution. Or until revoked. Pursuant to ~~49 CFR 111.36(a) election is made waiving the right to receive invoices, supporting documents and correspondences from Genus Logistics Inc., who is directed to forward all documents and inquiries concerning our imports to their customs brokerage services, to our freight forwarder, who will pay Genus Logistics Inc., for duties, and services performed on our behalf. It is understood the right to rev~~ (b) (6) ~~is continuing.~~

IN WITNESS WHERE OF, the said (Print name) Adam (b) (6) Writer

has caused these presents to be sealed and signed:

(Signature) Adam (b) (6) Writer

(Capacity) Individual / Self

(Date) 2/27/18

WITNESS John Writer

**MINISTRY OF ENVIRONMENT AND TOURISM**

Directorate Natural Resources Management

Private Bag 13308

Windhoek, Namibia

Enquiries: Chief Warden,

Permit Office



Tel: +264-61-284 2111

Fax: +264-61-258 881

PERMIT No.:

150107

VALID FROM:

27.07.2014

VALID TO:

18.08.2014

**PERMIT TO HUNT FOR TROPHIES**

Permission is hereby granted in terms of the Nature Conservation Ordinance 1975 (Ord. 4 of 1975)

Name of Trophy Hunter:

A. Writer

Residential Address:

LISA

Country:

To hunt the specified number of game for the sake of trophies:

**SPS** Indicates species listed on CITES Appendix I or II

	SPECIES: COMMON NAME	Number
	Buffalo	/
<b>SPS II</b>	Crocodile	/
	Dik-dik	/
	Eland	/
<b>SPS</b>	Elephant	1
	Giraffe	/
	Grey Duiker	/
<b>SPS II</b>	Hippopotamus	/
	Impala, Black-faced	/
	Impala, common	/
	Klipspringer	/
	Kudu	/
<b>SPS II</b>	Lechwe	/
	Oryx (Gemsbok)	/
	Ostrich	/
	Red hartebeest	/
	Reedbuck	/
<b>SPS I</b>	Rhinoceros, black	/
<b>SPS I</b>	Rhinoceros, white	/
	Roan	/
	Sable	/
	Springbok	/

	SPECIES: COMMON NAME	Number
	Steenbok	/
	Warthog	/
	Waterbuck	/
	Wildebeest, blue	/
	Zebra, Burchell's	/
<b>SPS II</b>	Zebra, Hartman's mountain	/
	Blesbok	/
	Wildebeest, black	/
<b>SPS I</b>	Cheetah	/
<b>SPS I</b>	Leopard	/
<b>SPS II</b>	Lion	/
	Other	/
* Please report Back within 48 hours After Shooting.		/
		/
		/
		/
		/
		/
		/
		/
		/
		/

On the following farms / hunting concessions:

Ukwaludhi Hunting Conservancy

Guided by (name of guides):

SM. Jacobs

Cashier receipt No.

MET 43314

Issued on

22.07.2014

Amount received: N\$

150.00

Authorizing Officer

Official MET date stamp

22 JUL 2014

**IMPORTANT: This permit is not valid if altered in any way**





REPUBLIC OF NAMIBIA

## MINISTRY OF ENVIRONMENT AND TOURISM

No.: A 05114

### APPLICATION TO POSSESS CONTROLLED GAME PRODUCTS

1. Christian name(s) and surname of applicant:

A. White  
(USA)

2. Identity No. / Passport No.:

3. Residential address:

Tel No.:

4. Postal address:

(USA)

5. From where are products obtained: Uukwahundlu

Conservancy

6. The following documents are attached as proof of ownership:

(a) Copy of permit (150107)

(b)

(c)

(d)

(e)

SIGNATURE OF APPLICANT









RCVD APR 9 201



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

OMB No. 1018-0164  
Expires 11/30/2016

# Federal Fish and Wildlife Permit Application Form

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

Type of Activity:  
Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros

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.

<b>A. Complete if applying as an individual</b>			
1.a. Last name <b>BODKIN</b>	1.b. First name <b>RICHARD</b>	1.c. Middle name or initial	1.d. Suffix
2. (b) (6)	4. Affiliation/ Doing business as (see instructions)		
(b) (6)			

<b>B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution</b>			
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

<b>C. All applicants complete address information</b>			
(b) (6)			
1.a. City <b>RANDENBURG</b>	1.b. State <b>NY</b>	1.c. Zip <b>(b) (6)</b>	1.d. Country <b>USA</b>
2.a. (b) (6)			
2.b. City <b>RANDENBURG</b>	2.c. State <b>NY</b>	2.d. Zip <b>(b) (6)</b>	2.e. Country <b>USA</b>

<b>D. All applicants MUST complete</b>	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: <b>MA17487C-0</b> No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature of applicant/person responsible for permit (No photocopied or stamped signatures) <b>[Signature]</b> Date of signature (mm/dd/yyyy) <b>3/27/18</b>	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: NA. (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: NA. (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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: NA

b. Date wildlife is to be hunted: NA

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).
3. **IF THE ANIMAL IS DEAD**, please enter the following:
- Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: **ZAMBIA. LOWER LUPANDE. AREA. (TOWN) MFLWE.**
  - Date wildlife was hunted:
  - Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):
  - 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]: **VILLA PARK PLOT 177/178 UNIT C LUANSHYA 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 appear on the face of the export permit].
- Name: Business **BRIDGE SHIPPING ZAMBIA LIMITED**  
 Name: Address: **VILLA PARK PLOT 177/178 UNIT C**  
 Address: **LUANSHYA ROAD**  
 City:  
 State/Province: **LUSAKA. ZAMBIA**  
 Country, Postal Code: **10101**
5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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.J. Date: \_\_\_\_\_







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

OMB No. 1018-0164  
Expires 11/30/2016

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**Return to:** U.S. Fish and Wildlife Service  
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5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

**Type of Activity:**  
**Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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 <b>KATEN</b>	1.b. First name <b>William</b>	1.c. Middle name or initial <b>-</b>	1.d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Occupation <b>(b) (6)</b>		
4. Affiliation/ Doing business as (see instructions)			
5.a. Telephone number <b>(b) (6)</b>	5.b. Alternate telephone number	5.c. Fax number	5.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		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>(b) (6)</b>			
1.b. City <b>PATCHOGUE.</b>	1.c. State <b>NY</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.f. Country <b>USA</b>
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)			
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province
2.f. Country			

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: <b>MA17486C-0</b> No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.	
Signature of applicant/person responsible for permit (No photocopied or stamped signatures) 	Date of signature (mm/dd/yyyy) <b>3/13/18</b>

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: NA (Import is limited to two per hunter per calendar year)  
**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: NA (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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: NA
  - b. Date wildlife is to be hunted: NA

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).
3. **IF THE ANIMAL IS DEAD**, please enter the following:
- Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: **ZAMBIA. LOWER LUPANDE AREA.**
  - Date wildlife was hunted: **NOV-1 (TOWN) MFWWE. 2017**
  - Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):
  - 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]:  
**VILLA PARK PLOT 177/178 UNIT C LUANSHYA 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 appear on the face of the export permit].
- Name: Business **BRIDGE SHIPPING ZAMBIA LIMITED**  
 Name: Address: **VILLA PARK PLOT 177/178 UNIT C**  
 Address: **LUANSHYA ROAD.**  
 City:  
 State/Province: **LUSAKA. ZAMBIA**  
 Country, Postal Code: **10101**
5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

1. Taxidermist/Broker's signature: NA. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: \_\_\_\_\_

Date: 3/13/18

*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.*

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 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):
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 (b) (6) WILLIAM KATEN
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.





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

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Division of Management Authority  
Branch of Permits, MS: 1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

Type of Activity

**Import of Sport-hunted Trophies of Southern  
African Leopard and Namibian Southern White  
Rhinoceros**

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 <b>SCHANZENBACH</b>	1.b. First Name <b>STEWART</b>	1.c. Name/Initial <b>(b) (6)</b>	1.d. Suffix
2.a. Business address <b>(b) (6)</b>	2.b. Telephone Number	2.c. Alternate Telephone Number	2.d. E-mail address

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

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

**Section C: All applicants complete address information**

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes) <b>(b) (6)</b>				
1.b. City <b>GRAND FORKS</b>	1.c. State <b>NORTH DAKOTA</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>
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 <i>Title 50 Part 13 of the Code of Federal Regulations</i> and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) <b>Stewart Schanzenbach</b> <b>03/29/2018</b>
Please continue to next page



**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND  
NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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.

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- 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 4:** Certain hunting trophies, including leopard 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.

- Complete all questions on the application.
- Mark questions that are not applicable with "N/A".
- If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.
- 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)?

STEWART SCHANZENACK

(b) (6)

A large black rectangular redaction box covers the contact information provided by Stewart Schanzenack.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

- a. Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20.
- b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia  
Quantity:        (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).

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 ANIMAL HAS ALREADY BEEN TAKEN, please enter the following:

- d. 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:  
Goodluck-Matabeleland North, Zimbabwe
- Grid reference 203213 S 280304 E
- e. Date wildlife is to be hunted:

April 17 2017 to April 25 2017

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

Mbalabala Safaris

- g. 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  
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). *N/A Zimbabwe does not utilize these*

8. Complete name and address of overseas person or business shipping the trophy to you.

- a. 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*  
Address: *Belmont*  
City: *Bulawayo*  
State/Province:  
Country, Postal Code: *Zimbabwe*

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. 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: \_\_\_\_\_

10. 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: Stewart Schenberg Date: 3/28/18

*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.*

11. 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  
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 1A  
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 <b>GARDNER</b>	1 b. First Name <b>RICHARD</b>	1 c. Middle Name/Initial	1 d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number	3 a. Alternate Telephone Number	4. E-mail address <b>MATT@GENUSLOGISTICS.CO</b>


## 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>(b) (6)</b>					
1 b. City <b>RENO</b>	1 c. State <b>NV</b>	1 d. Zip code/Postal code <b>(b) (6)</b>	1 e. County/Province	1 f. Country <b>US</b>	
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)	
 <b>STTY IN PART</b> 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.

**GENUS LOGISTICS INC.**

**161-15 Rockaway Blvd st 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. 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.  
b. Sex (if known). LOXODONTA AFRICANA, ELEPHANT, 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:

SOUTH AFRICA, NGQOTSHÉ, KWAZULU-NATAL

- b. Date wildlife was hunted:

5/22/2017

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

C. P. ALBERTS

- 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]:

LIFE FORM TAXIDERMALY  
7 ALUMINUM RD BOX 763  
WHITE RIVER  
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:

Address:

City:

State/Province:

Country, Postal Code:

LIFE FORM TAXIDERMALY  
7 ALUMINUM RD  
BOX 763  
WHITE RIVER  
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?

- 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: \_\_\_\_\_

*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).

JFKIA

# 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 #

(b) (6)

## CUSTOMS POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS, That,

Richard (b) (6) Gardner

(Full Name)

Residing at,

(b) (6)

Reno, NV

(b) (6)

hereby constitutes and appoints each of the following persons

Matthew Mayers dba Genus Logistics

may act through any of its offices 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 consigned 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 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 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. 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 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 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 111.36(a), election is made waiving the right to receive invoices, supporting documents and correspondences 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):

Richard Gardner

has caused these presents to be sealed and signed: (Signature):

[Signature]

Date: 4/18/16

WITNESS:

Judy Jones

Date:

4/18/16


 CONVENTION ON  
INTERNATIONAL TRADE IN  
ENDANGERED SPECIES OF  
WILD FAUNA AND FLORA

X

 EXPORT  
RE-EXPORT  
IMPORT  
OTHER

ORIGINAL

2. Valid until 21 Sept 2018

 3. Importer (name and address)  
 Mr. Richard (b) (6) Gardner  
 Reno  
 NV (b) (6)

 4. Exporter / Re-exporter (name, address and country)  
 Lifeform Taxidermy  
 7 Aluminium Road  
 Box 763  
 White River  
 SOUTH AFRICA

3a. Country of Import USA

 5. Special conditions imposed without attached conditions (Annex B  
 page 2)

6. Name, address, national seal / stamp and country of Management Authority

 Department of Environmental Affairs  
 Private Bag X447  
 PRETORIA  
 0001  
 SOUTH AFRICA

 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. Permit / certificate valid for one consignment only.

5a. Purpose of the transaction (see reverse)

It

5b. Security stamp No.

137 0626

 7.8 SCIENTIFIC NAME (genus and species)  
 AND COMMON NAME OF ANIMAL OR PLANT

 9. Description of speci-  
 mens, including identify-  
 ing 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 Elephant  
 Loxodonta africana

 9. Skin panels (leather)  
 tan

10. 11w

11. 3 (three)

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 \*\*\*

 B 7.8 Elephant  
 Loxodonta africana

 9. 1/2 tusk, front &  
 back panels (leather)  
 tan

10. 11w

11. 1 (one)

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 \*\*\*

 C 7.8 Elephant  
 Loxodonta africana

 9. 1/2 tusk, front &  
 back panels (leather)  
 tan

10. 11w

11. 1 (one)

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 \*\*\*

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

IMPULANGA TOURISM

8 PARKS AGENCY

PBA 11111111111111111111

13. THIS PERMIT / CERTIFICATE IS ISSUED BY: K. D. Mwakanga

Nelspruit

Place

22 March 2018

Date



Security stamp, signature and official seal

14. EXPORT ENDORSEMENT

15. Bill of Lading/Air Waybill Number

Block	Quantity
A	
B	
C	
D	

Port of Export

Date

Signature

Official stamp and title



# SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

Duration of Hunt: Commencing 22/05/2017

Terminating 28/05/2017

KZN 029550

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)	Mpumalanga (MP)	Western Cape (WC)	Eastern Cape (EC)	Northern Cape (NC)
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Post Permit To (mark correct block with X)

PROFESSIONAL HUNTER	
Name	<u>E.P. ALBERTS</u>
Business Address	<u>70 BOOYSEN STR</u> <u>MORRISVILLE</u>
Code	<u>0510</u>
I.D. No.	<u>900708 5005 087</u>
PH Permit No.	<u>934/2017</u>
Date	<u>28/5/17</u> Signature: <u>[Signature]</u>

CLIENT	
Name	<u>RICHARD CALDWELL</u>
Permanent Postal Address	<u>NEWTON ROAD</u>
Code	<u>USA</u>
Passport No.	<u>[Redacted]</u>
Tel/Fax	<u>[Redacted]</u>
Date	<u>28/5/17</u> Signature: <u>[Signature]</u>

HUNTING OUTFITTER	
Name	<u>E.P. ALBERTS</u>
Business Address	<u>70 BOOYSEN STR</u> <u>MORRISVILLE</u>
Code	<u>0510</u>
I.D. No.	<u>900708 5005 087</u>
Tel No.	<u>079969 3360</u>
H.O. Permit No.	<u>936/2017</u>
Date	<u>28/5/17</u> Signature: <u>[Signature]</u>

Farm Name	Magisterial District	Name & 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	Part of Trophy
VERGELEGEN	NGOTSHE	J.M. QUILLHIRST	OP1968/2017	22/05	28/05	ELEPHANT	1	✓	to be Exported 2x TUSKS 1x FEET 4x BONES 1x TAIL 2x EARS
						BUFFALO	1	✓	SKULL/HORNES EARS ANTHORN
						NYALA	1	✓	SKULL/HORNES HORNES
						WARTHOG	1	✓	TUSKS
						JACKAL	1	✓	SKULL/Full Hn

COPIES: Check Original Hand to client  
Hunting Outfitter 1st copy Forward to Nature Conservation authority where hunt took place  
Hunting Outfitter 2nd copy Retain for a period of three years  
Professional Hunter Last copy Retain in book

Address to which trophies are to be sent:	
<u>LIFE - FORM</u>	
Country:	Trophy Export Date (Estimate):





**EZEMVELO  
KZN WILDLIFE**

## **ORDINARY PERMIT**

Fee: R 1 100.00  
Receipt No: 1952/2017

Permit No: OP 1968/2017  
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: (b) (6)  
Richard (b) (6) Gardner  
c/o "KwaZulu Private Game  
Reserve"  
P.O.Box 591  
Pongola  
3170

Residential Address  
c/o "KwaZulu Private Game  
Reserve"  
Vergelegen Farm  
Magudu  
Pongola  
3170

Conservation District: Paulpietersburg  
Province: KwaZulu-Natal

In the capacity of Hunting Client  
To Hunt the following species of Game

AFRICAN ELEPHANT (LOXODONTA AFRICANA)  
1 (One)

Hunting Client:  
R (b) (6) Gardner  
(6)

(b) (6) Reno  
Nevada (b) (6)  
United States of America

Weapon: Rifle

Hunting Method: Walk & stalk

*Please read the Terms and Conditions under which this Permit is issued*

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 18 May 2017

  
for CHIEF EXECUTIVE

  
Permit Holder

OP 1968/2017

EZEMVELO KZN WILDLIFE PERMITS OFFICE  
PO Box 13053, Cascades, 3202, Pietermaritzburg, KwaZulu-Natal  
Tel +27 33 845 1320 / 1324 Fax +27 33 845 1747 Fax to Email 086 529 3320  
Email [permits@kznwildlife.com](mailto:permits@kznwildlife.com) Website: [www.kznwildlife.com](http://www.kznwildlife.com)

Page 1 of 3



**E Z E M V E L O  
K Z N W I L D L I F E**

**TERMS AND CONDITIONS UNDER WHICH THIS PERMIT IS ISSUED**

1. It is valid only:
  - (i) from : 18 May 2017  
to : 31 August 2017
  - (ii) in the original
  - (iii) if all 3 pages are signed by the permit holder named above
  - (iv) to the permit holder named above
2. By signing the permit or licence the holder accepts, and agrees to comply with the conditions under which it is issued.
3. This permit is not transferable
4. Any unauthorised alteration to this permit shall render it invalid
5. This permit/certificate is subject to the provisions of any applicable law in force during the period of validity of the permit/certificate.
6. This permit is valid only within the province where it was issued
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. 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.
11. The prescribed fee payable for the issuing of this permit shall not be refunded.
12. 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.
13. This permit shall be subject to any applicable norms and standards in existence at the time of issuance of this permit.

***Please read the Terms and Conditions under which this Permit is issued***

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 18 May 2017

**for CHIEF EXECUTIVE**

**Permit Holder**

**EZEMVELO KZN WILDLIFE PERMITS OFFICE**

PO Box 13053, Cascades, 3202, Pietermaritzburg, KwaZulu-Natal

Tel +27 33 845 1320 / 1324 Fax +27 33 845 1747 Fax to Email: 086 529 3320

Email: [permits@kznwildlife.com](mailto:permits@kznwildlife.com) Website: [www.kznwildlife.com](http://www.kznwildlife.com)

**OP 1968/2017**

**Page 2 of 3**



**E Z E M V E L O  
K Z N W I L D L I F E**

14. The issuing authority shall determine the species and restricted activities for which this permit will apply.
15. 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.
16. Return the original permit to the issuing authority forthwith after expiry of the permit.
17. 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.
18. 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.
19. 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](mailto:permits@kznwildlife.com) upon expiry. Failure to comply with this condition may jeopardise the issue of future permits.
20. Should the hunt be successful the client must produce a copy of a valid CITES import permit before an export permit will be issued.
21. All elephant ivory which is part of a trophy hunted by a client, whether South African or foreign, must be marked in accordance with the CITES requirements PRIOR to the tusks leaving the province. Failure to comply with this requirement might result in the tusks being brought back, at the Hunting Outfitters expense, to have the tusks marked.

*Please read the Terms and Conditions under which this Permit is issued*

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 18 May 2017

for CHIEF EXECUTIVE

Permit Holder

EZEMVELO KZN WILDLIFE PERMITS OFFICE

PO Box 13053, Cascades, 3202, Pietermaritzburg, KwaZulu-Natal.

Tel +27 33 845 1320 / 1324. Fax +27 33 845 1747. Fax to Email: 086 529 3320

Email: [permits@kznwildlife.com](mailto:permits@kznwildlife.com). Website: [www.kznwildlife.com](http://www.kznwildlife.com)

OP 1968/2017

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RCVD APR 10 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 1A  
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 <b>SWAN</b>	1.b. First Name <b>JOEL</b>	1.c. Middle Name/Initial <b>(b) (6)</b>	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address <b>MAIT@EENH51051571CS.CO</b>

## 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 P.O. Boxes) <b>(b) (6)</b>			
1.b. City <b>Lubbock</b>	1.c. State <b>TX</b>	1.e. County/Province <b>(b) (6)</b>	1.f. Country <b>US</b>
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) <b>[Signature]</b> <b>5/28/17</b>

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.

**GENUS LOGISTICS INC.**

161-15 Rockaway Blvd st 205  
Jamaica NY 11434

SASE / FEDEX

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. 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.

b. Sex (if known). *LOXODONTA AFRICANA, ELEPHANT, 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:

*NAMIBIA, BWA BWA EAST CONSERVATION*

b. Date wildlife was hunted:

*10/15/2017*

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

FRED BEZUIDENHOUT

- 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]:

NDUMO LODGE  
KALAMBEZA REGION  
KATIMA MULILO  
NAMIBIA

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: FRED BEZUIDENHOUT  
Business Name: Ndumo Lodge  
Address: Kalambeza Region  
City:  
State/Province: Katima Mulilo  
Country, Postal Code: NAMIBIA

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: 3/28/18

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).

JFK IA

**MINISTRY OF ENVIRONMENT AND TOURISM**

Directorate Natural Resources Management  
Private Bag 13306  
Windhoek, Namibia  
Enquiries: Chief Warden  
Permit Office



Tel +264 61 284 2111  
Fax +264 61-258 861

PERMIT No.:

175413

VALID FROM:

16.10.17

VALID TO:

24.10.17

RECEIPT No.:

3165711

# **PERMIT TO HUNT FOR TROPHIES**

Permission is hereby granted in terms of the Nature Conservation Ordinance 1975 (Ord 4 of 1975)

Name of Trophy Hunter:

J. S. Smith

Residential Address:

Country:

U.S.A

To hunt the specified number of game for the sake of trophies:

Indicates species listed on CITES  
Appendix I or II

SPECIES: COMMON NAME	Number
Buffalo	/
Crocodile	/
Dik-dik	/
Eland	/
Elephant	IX
Giraffe	/
Grey Duiker	/
Hippopotamus	/
Impala, Black-faced	/
Impala, common	/
Klipspringer	/
Kudu	/
Lechwe	/
Oryx (Gemsbok)	/
Ostrich	/
Red hartebeest	/
Reedbuck	/
Rhinoceros, black	/
Rhinoceros, white	/
Roan	/
Sable	IX
Springbok	/

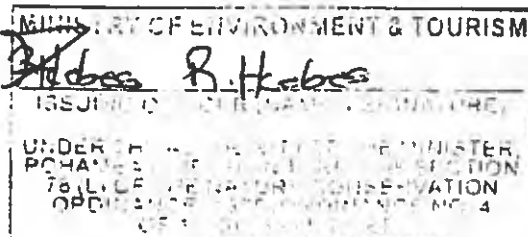
SPECIES: COMMON NAME	Number
Steenbok	/
Warthog	/
Waterbuck	/
Wildebeest, blue	/
Zebra, Burchell's	/
Zebra, Hartman's mountain	/
Blesbok	/
Wildebeest, black	/
Cheetah	/
Leopard	/
Lion	/
Other	/
* Report back within 48hrs after hunt	

on the following farms / hunting concessions:

Bona Bonita Ecotourism

Guided by (name of guides):

K. Stumpf & F. Beukdenhout



Official MET date stamp

**IMPORTANT:** This permit is not valid if altered in any way.

pleted immediately after each animal that has been hunted (please print)

[illegible]

No trophy hunter may hunt unless accompanied by a professional hunter, master hunting guide or hunting guide.

**This permit must be kept on the person of the permit holder at all times while hunting.**

**Only guide(s) as specified on the permit may conduct the hunt.**

# Genus Logistics Inc.

16115 Rockaway Blvd STE 205 Jamaica NY 11434

Office: (718) 790-0216 Fax: (516) 400-9787 Email: [matt@genuslogistics.com](mailto: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

Individual U.S. Customs Service Individual

IRS / SS #

(b) (6)

Individual

Partnership

Corporation

Partnership 141.32. C.R.

Sole Proprietorship

## CUSTOMS POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS: That, Joel Swan (Full Name of person, partnership, corporation, or sole proprietorship (Identify)) a corporation doing business under the laws of the State of TEXAS doing business as (b) (6) residing at (b) (6) Lubbock, TX (b) (6) having an office and place of business at (b) (6) hereby

constitutes and appoints each of the following persons Genus Logistics Inc. may act through any of its offices 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 consigned 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 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 at the customhouses in said district any and all customs business, including making, signing, and filling of protests under section 514 of the Tariff Act of 1930. In 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 power shall in no case have any force or effect after the expiration of 2 years from the date of its execution. Or until revoked. Pursuant to 19 CFR 111.36(a), election is made waiving the right to receive invoices, supporting documents and correspondences from Genus Logistics Inc., who is directed to forward all documents and inquiries concerning our imports to their customs brokerage services, to our freight forwarder, who will pay Genus Logistics Inc., 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) Joel Swan has caused these presents to be sealed and signed:

(Signature) Joel Swan

(Capacity)

(Date) 5/22/18

WITNESS







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: 1A  
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 <i>Knight</i>	1.b. First Name <i>Roger</i>	1.c. Middle Name/Initial (b) (6)	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) (b) (6)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address

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

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

## Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes) (b) (6)				
1.b. City <i>Salt Lake</i>	1.c. State <i>Utah</i>	1.d. Zip code/Postal code (b) (6)	1.e. County/Province	1.f. Country <i>USA</i>
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/Officer for permit (No photocopied or stamped signatures) <i>Roger Knight</i> (b) (6) 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.

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- 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)?

*Roger Knight*

(b) (6)

(b) (6)

*(Lowercase)*

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.

b. Sex (if known).

family: Elephantidae order: proboscidea order: loxodonta  
male common: Elephant African

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:

Save Valley conservancy, Sango province: masubi  
nearest town Masubiya

- b. Date wildlife is to be hunted:

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

Zambezzi Hunters w/ P.H. Ian Bachelor

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: Trophy Consultants International  
Business Name: Trophy Consultants International  
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?

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?

- 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: 3/31/18

*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 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).







APR 16 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 1A  
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 <b>Stevens</b>	1 b. First Name <b>Danny</b>	1 c. Middle Name <b>(b) (6)</b>	1 d. Suffix
2. Mailing address (include if different than physical address; include name of contact person, if applicable) <b>(b) (6)</b>			

## 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>(b) (6)</b>				
1. b. City <b>Austin</b>	1. c. State <b>TX</b>	1. d. Zip code/Postal code <b>(b) (6)</b>	1. e. County/Province	1. f. Country <b>USA</b>
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) <b>04/10/2018</b>	

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.

(b) (6)

Austin, TX (b) (6)

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

SHANE STEVENS

(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 Not Applicable.

4. For each trophy to be imported, provide:

- a. Scientific name (genus, species, and, if applicable, subspecies) and common name.  
Savanna or African Bush Elephant (*Loxodonta africana*)
- b. Sex (if known). Male or Bull Elephant

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- Zimbabwe  
Place- Beitbridge East (Rural District Council Concession- CAMPFIRE)  
Region- Matabeleland South  
Nearest City- Beitbridge

- b. Date wildlife is to be hunted:

May 4th 2018 - May 18th 2018

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

Zimbabwe Outfitter – Threeways 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:

N/A Not Applicable.

- b. Date wildlife was hunted:

N/A Not Applicable.

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

N/A Not Applicable.

- 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 Not applicable

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). **Elephant have 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: **Trophy Consultants International (T.C.I.)**

Business Name:

Address: **4 Josiah Chinamano Road**

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?

**Population Status: +- 300 elephants – Increasing every year.**

- 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?

**The income from the activity is mainly used for Law enforcement to stop poachers as well as to support the community at large.**

**Trophy fees are paid by the outfitter to Beitbridge Rural District Council and used to benefit the community.**

**All the meat from the trophy goes to feed the community.**

**The Safari Outfitter also donates Cattle to the community and also assist a disadvantaged school. A classroom building was built for the school and 48 Samsung Tablets were also donated recently.**

**The Outfitter always helps with any and all kinds of community crisis's and functions.**

- 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 Safari Outfitter supports anti-poaching units, funded by the trophy fees, in the area which greatly contributes to the conservation of the elephants in the area. Without these anti-poaching units fighting poachers and monitoring the area, the elephants in the area are at high risk of being killed or poached for illegal ivory trade.**

**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: N/A Not Applicable Date: N/A

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: 4-11-18

*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 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: 1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104


**Type of Activity:**  
**Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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 SAMPLE	1 b. First name WILLIAM	1 c. Middle name or initial (b) (6)	1 d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No.	4. Occupation business as (see instructions)	
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 CONROE TAXIDERMY, LP		1 b. Doing business as (dba) CONROE TAXIDERMY, LP	
2. Tax identification no. 76-0810696		3. Description of business, agency, Tribe, or institution TAXIDERMY	
4 a. Principal officer Last name SIMPSON	4 b. Principal officer First name BARRET	4 c. Principal officer Middle name/ initial (b) (6)	4 d. Suffix
5. Principal officer title GENERAL MANAGER		6. Primary contact name BEVERLY NICHOLS	
7 a. Business telephone number 281-367-2745	7 b. Alternate telephone number N/A	7 c. Business fax number 281-292-9565	7 d. Business e-mail address info@conroetaxidermy.com

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 SHREVEPORT	1 c. State LA	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) BEVERLY NICHOLS C/O CONROE TAXIDERMY 11845 CLARK LANE				
2 b. City CONROE	2 c. State TX	2 d. Zip code/Postal code 77385	2 e. County/Province MONTGOMERY	2 f. Country 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 <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: LE671441-0 No <input type="checkbox"/>	
3. Certification. I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) 11 April 2018	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**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 were 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:** The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

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, horns, tusks). N/A

3. **IF THE ANIMAL IS DEAD**, please enter the following:

a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: LUKWATI SOUTH GAME RESERVE, TANZANIA

b. Date wildlife was hunted: AUGUST 6, 2017

- 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 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 document]:

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 appear on the face of the export permit].

Name: Michel Mantheakis Safaris Ltd.  
Business Name:  
Address: PO Box 354  
Address:  
City: Dar es Salaam  
State/Province:  
Country, Postal Code: Tanzania

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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: 11-April 2018

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:

(b) (6)

Date: 04/04/2018

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 proposed activity. While the Service will attempt to assist where possible, 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 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):

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):

BEVERLY NICHOLS  
281-367-2745 info@conroetaxidermy.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.

## CUSTOMS POWER OF ATTORNEY

PLEASE ✓ APPROPRIATE BOX

<input checked="" type="checkbox"/> Individual	<input type="checkbox"/> Partnership	<input type="checkbox"/> Corporation	<input type="checkbox"/> Sole Proprietorship	<input type="checkbox"/> Limited Liability Company
--	--------------------------------------	--------------------------------------	--	--

KNOW ALL MEN BY THESE PRESENTS That William (b) Sample (b) doing  
(Full name of individual, partnership, corporation, sole proprietorship, or limited liability company [identify])

business as William (b) Sample (b) under the laws of the State of LA  
(Full name of individual, partnership, corporation, sole proprietorship, or limited liability company [identify])

residing or having a primary place of business at (b) (6) Shreveport, LA (b) USA hereby  
constitutes and appoints CONROE TAXIDERM, its officials, employees and/or specifically authorized agents, to act for and on its behalf as true and  
lawful agent and attorney of the grantor named for and in the name, place, and stead of said grantor from this date, in the United States ("territory"), either  
in writing electronically or by other authorized means, to:

Make, approve, sign, declare, or swear to any entry, withdrawal, declaration, certificate, bill of lading, carnet or any other documents required by law or  
regulation in correlation with the importation, transportation, or exportation of any merchandise in or through the Customs territory, shipped or consigned  
by or to said grantor

Execute any act or condition, which may be required by law or regulation in correlation with such merchandise deliverable to said grantor, to receive any  
merchandise,

Make approvals 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 Customs

Sign, seal, and deliver for and as the act of said grantor any bond required by law or regulation in correlation with the entry or withdrawal of imported  
merchandise or merchandise exported with or without benefit of drawback, or in any correlation 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 in  
correlation 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 correlation 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, approve and collect checks issued for Customs 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,

Generally transact Customs business, including filing 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,

Providing to said agent and attorney full power and authority to do anything necessary to be done in the premises as completely 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 of effect in the United States after the expiration 2 years from the dates of its  
execution),

Appointment as Forwarding Agent Grantor authorizes the above grantee to act within the territory as lawful agent and sign or approve export documents  
(i.e., commercial invoices, bills of lading, insurance certificates, drafts and any other document) necessary for the completion of an export on grantors  
behalf as may be required under law and regulation in the territory, and to appoint forwarding agents on grantor's behalf,

Grantor acknowledges receipt of CONROE TAXIDERM Terms and Conditions governing all transactions between the persons concerned. 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 William K. Sample Jr. (b) (6) (b) (6)

Caused these presents to be sealed and signed Signature X

Capacity: Individual

Date: April 9, 2018

Witness (if required)

William Sample (b) (6) (b) (6)







**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-1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

Type of Activity

**IMPORT OF SPORT-HUNTED TROPHIES OF BONTBOK  
TROPHIES FROM SOUTH AFRICA**

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 <b>Lee</b>	1.b. First Name <b>Todd</b>	1.c. Initial <b>(b) (6)</b>	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address


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

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

**Section C: All applicants complete address information**

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) <b>(b) (6)</b>				
1.b. City <b>Fulshear</b>	1.c. State <b>TX</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>
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)	
	

Please continue to next page

**IMPORT OF SPORT-HUNTED BONTBOK TROPHIES from South Africa**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** The bontbok is listed as endangered under the Endangered Species Act. Applications for endangered species permits must be published in the Federal Register for a 30-day public comment period. Allow at least 90 days for the application to be processed.

**Note 4:** This application can only be used if you have hunted/will be hunting in **South Africa**. If you have or will be hunting in a different country, please use form [3-200-20](#)

**Note 5:** *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:
  - 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;
  - 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
  - The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

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)?

Todd Lee

(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. How many Bontebok (*Damaliscus pygargus pygargus*) are you applying to import? Quantity: \_\_\_\_\_

a. At the time of the application, the specimen(s) is:

Alive

☒ Dead

b. What is the approximate date of proposed take? NIA

c. What is the date you took the animal? NIA

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]:

Buck n Buss Taxidermy, Mariandahl Farm  
Adderby Road, Philadelphia, R.S.A.

5. ENTER the name and address of the landowner on whose property the bontebok was or will be taken:

Owners name:

Farm Name: Rheinmetall Pend Munition RF (pty) Ltd

District: Wellington, RSA

Address: Wellington, RSA

City:

State/Province:

Country, Postal Code:

Capetown  
Western Cape

South Africa, 7655

Please be aware that the bontebok is listed in Appendix II of CITES. As such, you must obtain a CITES export permit from South Africa. If you are not exporting the trophy from South Africa directly to the United States, you will need to obtain a CITES Re-export certificate from the re-exporting country.

6. Attach a signed statement from the landowner giving you permission to cull a bontebok from their captive herd.

see attached

7. If available, provide a copy of the landowner's Certification of Registration for the bontebok herd. (Note: this is not a copy of the export permit or certificate issued by a South African province.) In order to meet the criteria for a permit under the Endangered Species Act, the bontebok must be culled from a ranch that has been certified by the Government of South Africa under their bontebok program. If the ranch is not registered, we may be unable to issue an import permit.

NIA

8. **Complete name and address of overseas person or business shipping the trophy to you (this name will appear on the face of the permit).**

Name: Buck'n Bass Taxidermy  
 Business Name: Buck'n Bass Taxidermy  
 Address: Manan dahl Farm, Adderly Road, Philadelphia, R.S.A.  
 City: Cape Town  
 State/Province: Western Cape  
 Country, Postal Code: South Africa 7304

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. **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).

Taxidermist/Broker's signature: \_\_\_\_\_ N/A Date: \_\_\_\_\_

10. **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 <sup>purchased</sup> ~~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).

Applicant's signature: \_\_\_\_\_ [Signature] Date: 4/19/18

*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 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).



1/21/6/2/B-Exp

PERMIT / CERTIFICATE N° 215711



CONVENTION ON  
INTERNATIONAL TRADE IN  
ENDANGERED SPECIES OF  
WILD FAUNA AND FLORA

☒ EXPORT  
☐ RE-EXPORT  
☐ IMPORT  
☐ OTHER

EXPORT  
RE-EXPORT  
IMPORT  
OTHER

ORIGINAL

2 Valid until 13/09/2018

3 Importer (name and address)

Mr. Todd Lee

(b) (6)

Fulshear, Texas

(b) (6)

3a Country of import

United States of America

4 Exporter / Re-exporter (name, address and country)

Buck A Bass Taxidermy  
Mariandahl Farm, Adderley Farm  
Philadelphia  
South Africa

5 Special conditions

Blocks 14 & 15 of this permit  
must be completed prior to export.  
Bontebok from a pure registered herd, RDM  
Wellington, RSA.

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. 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)

P

5b Security stamp No

1368322

7a 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

7b *Damalisca pygargus pygargus*  
Bontebok

9 Wall pedestal  
Mount II W

10  
II W

11 (One)  
01

11a

A

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 \*\*\*

B

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 \*\*\*

C

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 \*\*\*

D

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 L. Philander



Cape Town

Place

14/03/2018

Date

Security stamp, signature and official seal

14. EXPORT ENDORSEMENT

15 Bill of Lading/Air Waybill Number

Block	Quantity
A	
B	
C	
D	

Port of Export

Date

Signature

Official stamp and title



# BUCK 'N BASS TAXIDERMY CC

Mariandahl Farm, Adderley Rd, Philadelphia  
P.O. Box 1840, Durbanville, 7551, South Africa  
Tel: +27 (21) 972-1441 Fax: +27 (21) 972-1440  
email: bucknbass@mweb.co.za

CK 1993/014986/23



22<sup>nd</sup> March 2018

To whom this may concern,

## RE: DECLARATION OF BONTEBOK WALL PEDESTAL MOUNT

I Olivia Rodrigues, ID 8502070225088, of Buck 'n Bass Taxidermy, Mariandahl Farm, Adderley Road, Philadelphia, Cape Town, R.S.A. would like to send Mr. Todd Lee of (b) (6) Fulshear, Texas (b) (6) U.S.A. a Buck 'n Bass Taxidermy stock item Bontebok Wall Pedestal Mount that he has purchased.

This Bontebok was hunted legally and all the correct documentation is available.

We have had this Bontebok Wall Pedestal Mount at Buck 'n Bass Taxidermy since 2015.

I Olivia Rodrigues declare that the above information is correct.

Signed at Buck 'n Bass Taxidermy on the 22<sup>nd</sup> March 2018

Signature of Olivia Rodrigues:

## WRITTEN PERMISSION TO HUNT

**Name of landowner:**

Stephan Mitchell

**Residential address of landowner:**

27 Zinfandell Street

Somerset West,

7130 South Africa

**Destination of land or property:**

Somchem, Krantzkop, Wellington

Western Cape, South Africa

**Bontebok Registered Herd from Farm:**

RDM Wellington Factory

**Name of person requesting permission:**

Mr. Edwin Rymut

**Residential address of person requesting permission :**

Mr. Edwin Rymut

(b) (6)

Fort Atkinson Wisconsin (b) (6)

U.S.A.

### **PARTICULARS OF GAME / WILD OR EXOTIC ANIMALS**

<b>Number</b>	<b>Sex</b>	<b>Species</b>
2	M	Bontebok

**Period during which the game / wild or exotic animals may be hunted: 17/04/2015 to 17/04/2015**

**Signature of landowner:**



**Date:**

17/04/2015

**Signature of person whose hunting rights are being transferred:**

**Date:**

17/04/2015



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: 1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

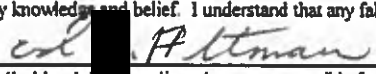
Type of Activity:  
Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros

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 <b>Altmann</b>	1 b. First name <b>Edward</b>	1 c. Middle name or initial [REDACTED]	1 d. Suffix
2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
6 a. Telephone number	6 b. Alternate telephone number	6 c. Fax number	6 d. E-mail address
[REDACTED]	[REDACTED]	[REDACTED]	[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	
[REDACTED]		[REDACTED]	
4 a. Principal officer Last name	4 b. Principal officer First name	4 c. Principal officer Middle name/ initial	4 d. Suffix
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
5. Principal officer title		6. Primary contact name	
[REDACTED]		[REDACTED]	
7 a. Business telephone number	7 b. Alternate telephone number	7 c. Business fax number	7 d. Business e-mail address
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

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

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

Please continue to next page



**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**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 were 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:** The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). Note: once imported, ivory cannot be re-exported.

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

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, horns, tusks).
3. IF THE ANIMAL IS DEAD, please enter the following:
  - a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild:  
Wembley Ptn 1 #203, Good Hope Ptn 2 #298, Maltzeit Rem #230 & Prost Ptn #231
  - b. Date wildlife was hunted:  
November 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):

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 document]:

The Yellow Shark Holdings Pty Ltd  
Windmill Park Unit 7  
Dante Street  
Prosperita  
Windhoek

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 appear on the face of the export permit].

Name: Andre Bennet

Business Name: Undjovo Hunting Safaris

Address: P.O. Box 80087

Address:

City: 9000 Windhoek

State/Province: Republic of Windhoek

Country, Postal Code: Namibia

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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: Ed [redacted] Hittman Date: 4-13-2018

*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.*

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.fvs.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).

ORD, Chicago, IL

9. 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):

Ed Altmann

[REDACTED]

Wisconsin Rapids, [REDACTED]

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):

Ed Altmann

[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.





10 April, 2018

(b) (6)


Irma, WI (b) (6)

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

Dear U.S. Fish and Wildlife Service:

This letter is to serve as a cover letter for my accompanying Federal Fish and Wildlife Permit application form 3-200-20. Also included with the form you will find one Zimbabwe Park and Wildlife Management Authority hunting permit (used in Section E –question #7), 4 pages of a 2017 Game Census for Hwange National Park and Surrounding Area – Matabeleland Branch (used in Section E – question #9-a), and one personal check #1039 for \$100.00 USD as per 50 cfr 13.11 subpart B, Cities Import (includes trophies under ESA and MMPA). If you have any questions or concerns you can contact me at my home phone of (b) (6) by email at (b) (6) or by the address listed on both this cover letter and the completed permit application. The application instructions listed on pages 6 and 7 are not included with the application.

Thank you and sincerely,

A handwritten signature in black ink, appearing to read 'Steven Metzenbauer', is written over a black rectangular redaction box. The signature is fluid and cursive.

Steven (b) (6) Metzenbauer



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

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

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

## Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes) (b) (6)				
1.b. City Irma	1.c. State Wisconsin	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) N/A - See 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) (b) (6) 04/10/2018	

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.
  - N/A – See physical address in Section C – section 1a through 1f
2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?
  - Steven <sup>(b) (6)</sup> Metzenbauer <sup>(b) (6)</sup>

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.
- Disambiguation – African Elephant
- 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:
- Deka Tail Safari Area  
Matabeleland North Province  
Zimbabwe  
Nearest City – Bulawayo
- b. Date wildlife is to be hunted:
- 18 September through 27 September 2018
- c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
- Nengasha Safaris, Zimbabwe, Africa

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 – hunt not yet taken place
- b. Date wildlife was hunted:
- N/A – hunt not yet taken place
- c. Name of hunting outfitter, safari company, or professional hunter you hunted with:
- N/A – hunt not yet taken place
- 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 – hunt not yet taken place

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).

- Animal has not been hunted as of yet. However, see accompanying hunting permit date stamped 16 Jan. 2018, for Deka Tail Safari Area issued by Zimbabwe National Parks and Wildlife Authority indicating **3 Elephant Bulls** on license for 2018.

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: Nengasha Safaris

Business Name: Nengasha Safaris

Address: 36A Townsend Road, Suburbs

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?

- Yes – Elephant numbers in this region which includes Hwange National Park and the Matetsi complex continue to increase. This increase in numbers is confirmed in the accompanying Zimbabwe "2017 Game Census for Hwange National Park and Surrounding Areas – Matatabeleland Branch" 4 page report. On the tables shown on pages 3 and 4 of this report, the census dated 04-Oct-2017 showed 23,631 Elephants for 2017 as compared to 21,613 in 2016. With regards to Deka Tail Safaris Area in particular, the area has very good water supplies in forms of dams, rivers, and boreholes. During the dry season, large numbers of Elephants build up in this area leading to considerable pressure on water supplies and habitat destruction.

- 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 the landowner, community, or government?

- The trophy fee is by the Safaris Operator. The fee charges are \$16,000.00 USD. A percentage of this fee is paid by the operator to Zimbabwe National Parks in the form of concession fees and trophy fees. Nengasha Safaris works closely with the National Park authorities mainly through their Sinamatella Offices. A good relationship has been established and the National Parks provide at least one and often two anti-poaching teams to operate in the Deka Tail Area at any one time in reducing levels of poaching in the safaris area.

- 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

- Nengasha Safaris raises funds from client payments in the form of the trophy fees and daily rates. A large percentage of these funds are used in the concession practices including:
  - A full time anti-poaching team with a dedicated vehicle and manger.
  - Maintaining roads and firebreaks through the Safaris Area.



- Nengasha Safaris also assists in providing fuel to the National Parks which is used to deploy anti-poaching teams both in the Park and the Safaris Area.

**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: N/A Date: N/A

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: 04/10/2018

*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).

010 001086

Section E-Queston #7

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**

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

PCA: .....

PCA 172

Amount paid \$250

Rec No. 1129044

Date 16/01/18

(payment details)

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.....

and co-hunter .....

of .....

Firstly to hunt in Hunt Number or Section .....Deka Tail..... 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.....01-01-18

and.....31-12-18

Animal	A	B	Animal	A	B	Animal	A	B
Baboon		20	Guinea fowl		150	Pigeons/ Doves		150
Buffalo (m)		6	Giraffe (m)		1	Porcupine		2
Bushbuck m		3	Impata(f)		10	S. Hyena (m)		3
Bushig		2	Impala(m)		10	Sandgrouse		50
Civet		1	Jackal		2	Serval		1
Duiker (m)		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	XXXXXXXXXXXXXXXXXXXXXXX		
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.



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

(Designation .....AREA MANAGER.....)

for Finance Manager

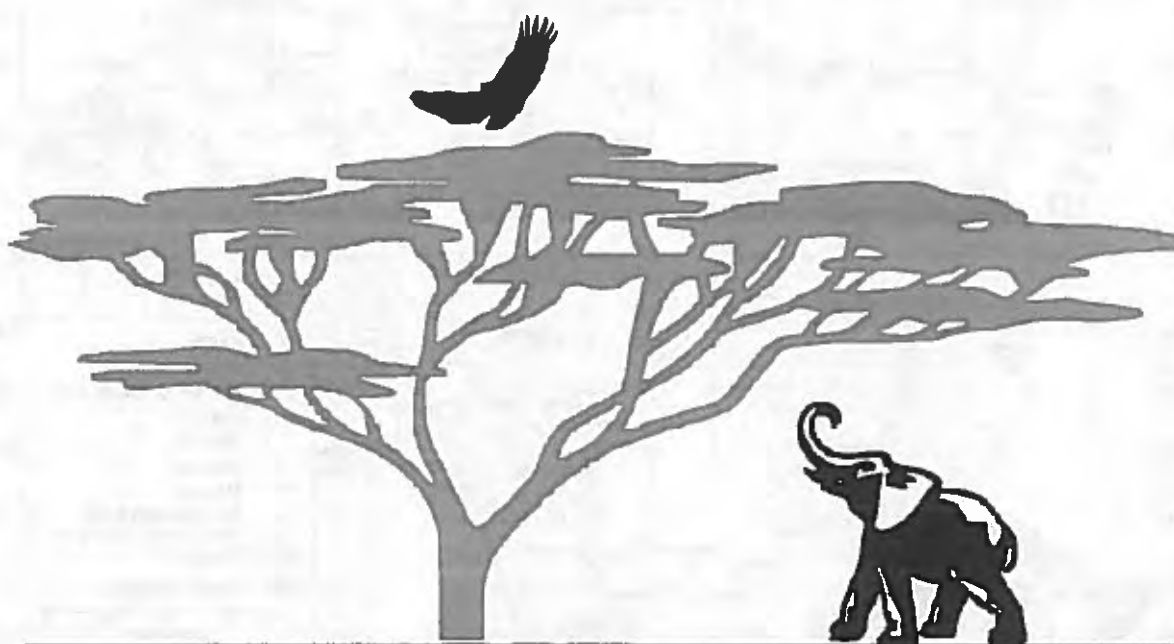
for and on behalf of the Director General, Parks and Wild Life Management Authority

(Designation .....D.G.....)

Printed by Printflow (Private) Limited,

*Section E - Question # 9-a*  
*Attachment consists of 4 pages*

2017 GAME CENSUS FOR  
HWANGE NATIONAL PARK AND SURROUNDING  
AREAS



**MATABELELAND BRANCH**

Compiled and Produced by Wildlife & Environment Zimbabwe  
Matabeleland Branch

*page 1*

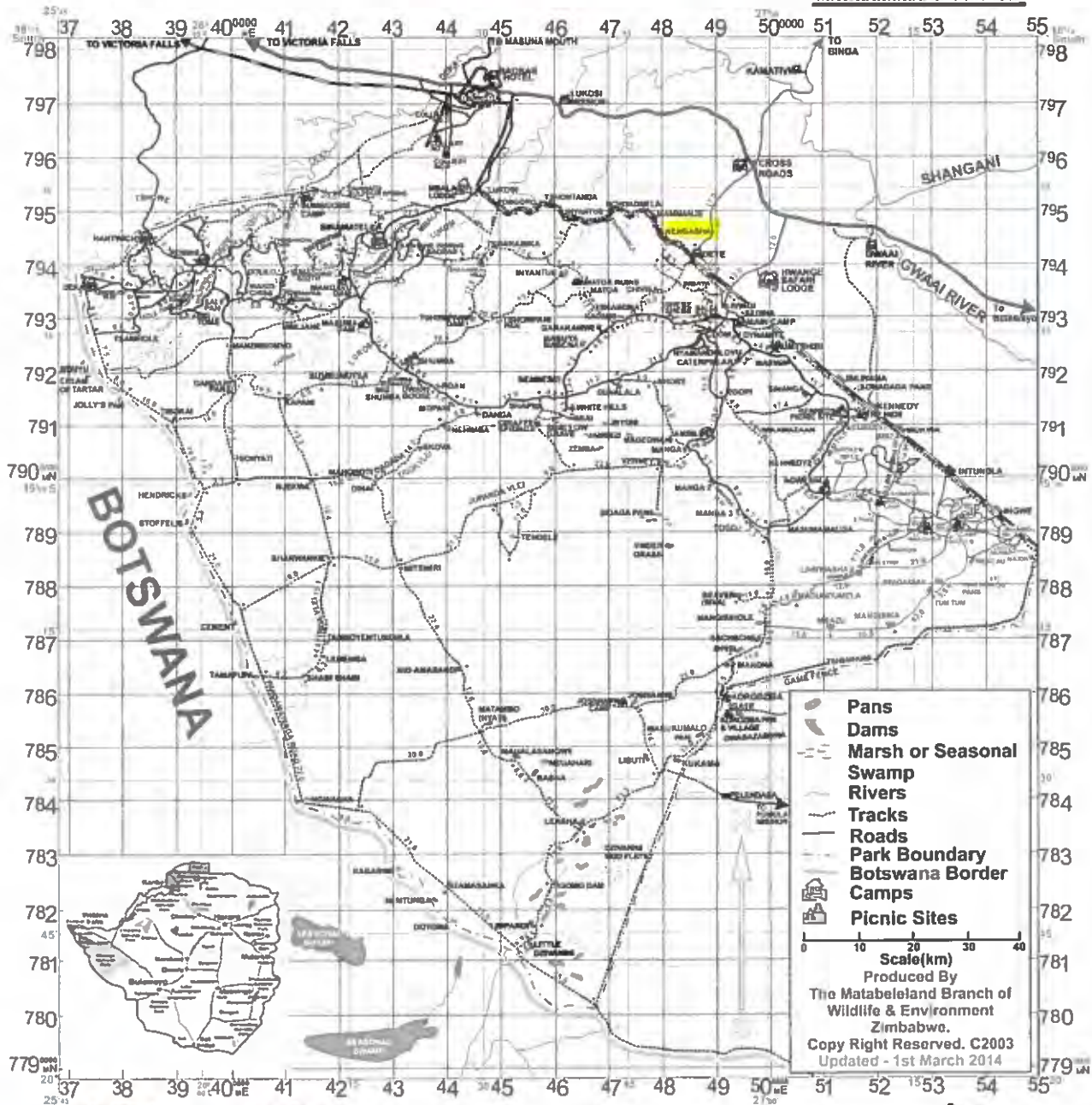




# HWANGE NATIONAL PARK



MATABELELAND BRANCH



page 2

**Wildlife & Environment Zimbabwe - Matabeleland Branch**  
**--- Animal Count for Hwange National Park, Safari Lodge and Forestry Areas ---**

Combined Total For All Areas - 24 Hour Period      Number Of Different Species Seen : 39      Date : 04-Oct-17

SPECIES	MALE	FEMALE	UNCLASSIFIED	JUVENILE	TOTAL
AARDVARK	0	0	1	0	1
BABOON, CHACMA	230	347	1527	429	2533
BUFFALO, CAPE	98	1485	2676	110	4369
BUSHBUCK	8	14	3	2	27
CAT, AFRICAN WILD	0	0	1	0	1
CHEETAH	1	2	1	1	5
CIVET	0	0	7	0	7
DUIKER, COMMON	6	6	23	0	35
ELAND	19	43	0	15	77
ELEPHANT, AFRICAN	2496	6884	9759	4542	23681
GIRAFFE	35	50	72	13	170
HARE, SCRUB	2	0	13	0	15
HIPPOPOTAMUS	8	14	51	12	85
HONEY BADGER	0	0	8	0	8
HYAENA, SPOTTED	9	5	267	2	283
HYRAX, ROCK	0	0	23	0	23
IMPALA	902	2158	386	102	3548
JACKAL, BLACK-BACKED	14	15	88	3	120
JACKAL, SIDE-STRIPED	2	1	15	0	18
KUDU	276	708	39	87	1110
LEOPARD	1	0	3	0	4
LION	25	47	8	11	91
MONGOOSE, BANDED	0	0	70	0	70
MONGOOSE, SLENDER	0	1	12	0	13
MONGOOSE, WHITE-TAILED	0	0	3	0	3
MONKEY, VERVET	9	13	144	30	196
POLECAT, STRIPED	0	0	1	0	1
PORCUPINE	0	0	1	0	1
REEDBUCK	21	45	20	4	90
ROAN ANTELOPE	43	82	26	36	187
SABLE ANTELOPE	97	154	57	65	373
SPRINGHARE	0	0	54	0	54
STEENBOK	8	8	10	1	27
TSESSEBE	5	1	2	0	8
WARTHOG	149	174	260	119	702
WATERBUCK	37	71	0	13	121
WILD DOG	0	0	24	1	25
WILDEBEESTE, BLUE	10	43	318	13	384
ZEBRA, BURCHELL'S	65	281	894	97	1337
<b>Total</b>	<b>4576</b>	<b>12652</b>	<b>16867</b>	<b>5708</b>	<b>39803</b>

We would like to thank The Department of National Parks and Wildlife Management, our members, supporting concessions, and all other parties concerned for their contribution in assisting us to compile this report.

*Page 3*

Species Name	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
Aardvark								1		2								1
Aardwolf					2	1	3	1	1	2			1			1		
Baboon, Chacma	1395	1767	2154	1541	1438	2520	1723	1970	2067	604	2556	2208	2808	2757	2665	3301	3204	2533
Bat, Yellow House		1																
Bat-eared Fox	5	3	6	4	9		5	2	5			1						
Buffalo, Cape	2032	3545	2004	4027	2795	5800	1853	3628	3198	661	2218	3433	4779	2976	3655	3033	4919	4369
Bushbuck	8	1	34	10	15	23	7	18	10	9	46	42	37	9	14	47	24	27
Bushpig		1		4			1	7		6	4	7						
Caracal	1		2											1				
Cat, African Wild		2						3			1	2	1			1	1	1
Cheetah		1		2	5	1	7				8	1	3	7	2	7	1	5
Civet	3	3	6	6	1	4	2	5	6	1	5	2	5	1	6	8	7	7
Crocodile, Nile	43	25	71	102									13		4	50		
Dormouse										1								
Dulker, Common	6	5	14	23	3	34	3	31	8	3	15	3	28	39	7	21	116	35
Eland	10	121	164	71	160	114	49	105	113		106	133	38	29	86	68	141	77
Elephant, African	9283	8353	17956	18910	7162	18918	7413	19266	11862	4322	13080	23569	14836	20373	22414	28241	21613	23681
Gemsbok				1								2	4			18		
Genet, Small-spotted	3		2				2			2			1				2	
Giraffe	342	411	248	271	267	229	229	246	249	225	150	153	174	202	273	184	160	170
Grysbok, Sharpe's		1	2			3			1		2	3	1	3		1		
Hare, Scrub	19	12	10	6	6	8	22	4	9	1		4	10	13	17	30	25	15
Hartebeest, Red						2	2	1	1									
Hippopotamus	63	28	71	42	28	67	50	55	73	36	78	90	106	118	144	116	154	85
Honey Badger	8	3	16	9	9	9	8	9	10	8	25	13	12	7	10	9	12	8
Hyaena, Brown						3	3	3	1			1		7	5	1	2	
Hyaena, Spotted	175	108	194	170	104	223	143	208	135	67	141	206	237	261	233	307	236	283
Hyrax, Rock				10					28	5	11	5	2	3		2	23	23
Hyrax, Yellow Spotted	28					2	1											
Impala	1639	1277	2927	3211	3067	3894	3184	3308	3071	1129	2953	3406	4449	3021	3362	3753	4129	3548
Jackal, Black-backed	98	85	96	121	88	172	127	150	118	87	76	110	140	156	175	135	160	120
Jackal, Side-striped	5	2	14	8	10	16	8	8	4	5	18	17	17	25	15	26	22	18
Klipspringer			3	1	2			3	2	2			2	3	2	8	3	
Kudu	487	314	1109	1358	553	1386	309	865	669	58	800	843	1598	1172	859	1411	1527	1110
Leopard	12	6	9	10	4	17	6	15	7	1	8	7	7	11	4	14	13	4



RCVD APR 17 2018

<b>STEVEN (b) (6) METZENBAUER</b>		2-2566/710	(b) (6)
(b) (6)		DATE <u>4/14/18</u>	
(6)			
PAY TO THE ORDER OF <u>U.S. Fish and Wildlife Service</u>		\$ <u>100<sup>00</sup></u>	
<u>one hundred dollars and 00/100</u>		DOLLARS	
<b>BMO Harris Bank</b> BMO Harris Bank N.A. Chicago, Illinois			
MEMO <u>3-200-20</u>		(b) (6)	
(b) (6)			



**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 of Southern  
African Leopard and Namibian Southern White  
Rhinoceros**

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 <b>WILBANKS</b>	1.b. First Name <b>DELBERT</b>	1.c. Middle Name/initial <b>(b) (6)</b>	1.d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>			

**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>(b) (6)</b>				
1.b. City <b>DELHI</b>	1.c. State <b>LA</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>
2.a. Mailing address (include if different than physical address, include name of contact person if applicable) <b>WELL WORLDWIDE, ATTN: LYNETTE LILLEY, 17401 ALDINE WESTFIELD RD</b>				
2.b. City <b>HOUSTON</b>	2.c. State <b>TX</b>	2.d. Zip code/Postal code <b>77073</b>	2.e. County/Province <b>HARRIS</b>	2.f. Country <b>USA</b>

**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)  <i>Lynette Lilley, Atty Instruct, Well Worldwide Energy, 04/12/2016</i> <b>Please continue to next page</b>

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** *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 4:** Certain hunting trophies, including leopard 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.

- Complete all questions on the application.
- Mark questions that are not applicable with "N/A".
- If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.
- 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 ATTACHED

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

LYNETTE LILLEY, 281-606-2400, 11lilley@well-usa.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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):
- a. Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20.
  - b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity:        (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).

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 ANIMAL HAS ALREADY BEEN TAKEN, please enter the following:

- d. 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, MUCHINGA PROVINCE, MPIKA  
12 DEGREES 24' 28.2"S  
32 DEGREES 10' 18.1"E
- e. Date wildlife is to be hunted:  
AUGUST 28, 2017

- f. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:  
 SYLVIA VAN STADEN  
 VAN STADEN SAFARIS (Z) LTD.  
 PLOT 3, GREAT EAST RD. WATERFALLS, LUSAKA  
 P.O. BOX 38498  
 LUSAKA, CENTRAL PROVINCE, ZAMBIA 0000
- g. 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]:  
 SYLVIA VAN STADEN  
 SITATUNGA RANCHING & SAFARIS C/O VAN STADEN SAFARIS (Z) LTD.  
 PLOT 7301 KAMBALA RD  
 P.O. BOX 38498  
 LUSAKA, CENTRAL PROVINCE, ZAMBIA 0000
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.
- a. 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: SYLVIA VAN STADEN  
 Business Name: SITATUNGA RANCHING & SAFARIS C/O VAN STADEN SAFARIS (ZA) LTD  
 Address: PLOT 7301 KAMBALA RD  
 Address: P.O. BOX 38498  
 City: LUSAKA  
 State/Province: CENTRAL PROVINCE  
 Country, Postal Code: ZAMBIA 0000

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. 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: \_\_\_\_\_

10. 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:

*Rynette Lickay*  
*Atty In Fact, WELL Worldwide Energy*

Date: *04/12/2018*

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.

11. 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).



**U.S. CUSTOMS POWER OF ATTORNEY**

for a

**U.S. RESIDENT IMPORTER & EXPORTER**

Department of Homeland Security  
US Customs and Border Protection  
19 CFR 141.32

Phone#

Cell Phone

Email

Check appropriate box(2)

- ☒ An Individual  
☐ A Sole Proprietorship  
☐ A Partnership  
☐ A Corporation  
☐ A Limited Liability Company



SS#

KNOW ALL MEN BY THESE PRESENTS: That (3) Delbert Wilbanks

(your name)

Doing business as

under the laws of the State of (4) Delhi, LA

(Residing or having a principal

home address (5) (b) (6)

hereby constitutes and appoints WELL Worldwide Energy Logistics, Inc to act through its officers, employees and specially designated agents which are duly authorized by said Grantee by power of attorney

As a true and lawful agent and attorney of the Grantor named above for and in the name, place and 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 such merchandise; to receive any merchandise deliverable to said Grantor;

To make endorsements on bills of lading conferring authority to transfer title; to make entry and collect drawback; and to make, sign, declare, or swear to any statement, supplemental statement, schedule, supplemental schedule, certificate of delivery, certificate of manufacture, certificate of manufacture 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, certificates, abstract, declaration, or other affidavit or document is intended for filing in any other 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 exported with or without benefit of drawback or in connection with the entry, clearance, lading, unloading or navigation of any vessel or other means of conveyance owned or operated by said Grantor, and any and all bonds of which may be voluntarily given and accepted under applicable laws and regulations, consignee's and owner's declaration provided for in section 485 Tariff Act of 1990 amended or affidavits in connection with the entry or 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, cleaning, lading, unloading, or operation of any vessel or other means of conveyance owned or operated by Grantor;

To grant powers of attorney on behalf of said Grantor to other Customs Brokers to act as said Grantor's agent, to receive, endorse and collect checks issued for Customs duty refunds in said Grantor's name drawn on the Treasurer of the United States;

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, 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 said agent and 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

(a) ☒ Revoked

(Date when to select date)

If Grantor is a partnership or LLC, signatory certifies that he/she has full authority to execute this instrument on behalf of Grantor and shall state the names of all members and/or directors on a separate addendum to this document, and said the power shall in no case have any force or effect beyond two years from the date of its execution.

Grantor further authorizes Grantee to act as its agent in signing or endorsing export documents, i.e. commercial invoices, shipper's export declarations, Automated Export System records, bills of lading, insurance certificates, drafts and any other documents necessary to the successful completion of any export transaction on its behalf.

If Grantor is a U.S. Principal Party in Interest (USPPI) in an export transaction then the Grantor/USPPI hereby certifies that all statements and information contained in the documentation provided to Grantee relating to exportation are true and correct. Furthermore, Grantor/USPPI understands that civil and criminal penalties may be imposed for making false or fraudulent statements or for the violation of any United States laws or regulation on exportation Grantor/USPPI undertakes to determine any export license requirements and to obtain, for export purposes, any export license or other official authorization.

All services and transactions are subject to WELL's Terms and Conditions of Service (NCBFFA 8/94) which are included in this document for which Grantor expressly acknowledges receiving a written copy. To the extent provided by law, WELL's liability as a Customs Broker is limited to \$50 00 (19 USC 1641(f)).

IN WITNESS WHEREOF, the said Grantor has caused these presents to be sealed and signed.

(signature) Delbert Wilbanks

(capacity) (7)

(If Duty Authorized Representative, supporting documentation must be provided)

(print name) (8) Delbert Wilbanks

(date) (9) 5/5/16

If you are the importer of record, payment to the broker will not relieve you of liability for Customs charges (duties, taxes, or other debts owed Customs) in the event the charges are not paid by the broker. Therefore, if you pay by check, Customs charges may be paid with a separate check payable to the "Bureau of Customs and Border Protection" which shall be delivered to Customs by the broker (19 CFR 111.29). If you elect to make payment with a check made payable to the Bureau of Customs and Border Protection, arrangement must be made in advance.





**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 of Southern  
African Leopard and Namibian Southern White  
Rhinoceros**

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 <b>PICKETT</b>	1.b. First Name <b>LAWRENCE</b>	1.c. Middle Name/initial <b>(b) (6)</b>	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>			

**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>(b) (6)</b>				
1.b. City <b>DELHI</b>	1.c. State <b>LA</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>
2.a. Mailing address (include if different than physical address; include name of contact person if applicable) <b>WELL WORLDWIDE, ATTN: LYNETTE LILLEY, 17401 ALDINE WESTFIELD RD</b>				
2.b. City <b>HOUSTON</b>	2.c. State <b>TX</b>	2.d. Zip code/Postal code <b>77073</b>	2.e. County/Province <b>HARRIS</b>	2.f. Country <b>USA</b>

**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>Lynette Lilley, WELL Worldwide, Atty In Fact</b> <b>04/12/2018</b>
Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** *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 4:** Certain hunting trophies, including leopard 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.

- Complete all questions on the application.
- Mark questions that are not applicable with "N/A".
- If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.
- 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 ATTACHED

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

LYNETTE LILLEY, 281-606-2400, 11lilley@well-usa.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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):
- a. Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20.
  - b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia  
Quantity:        (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).

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, MUCHINGA PROVINCE, MPIKA  
12 DEGREES 24' 28.2"S  
32 DEGREES 10' 18.1"E
- b. Date wildlife is to be hunted:  
AUGUST 28, 2017
- c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:  
SYLVIA VAN STADEN  
VAN STADEN SAFARIS (Z) LTD.  
PLOT 3, GREAT EAST RD. WATERFALLS LUSAKA  
P.O. BOX 38498  
LUSAKA, CENTRAL PROVINCE, ZAMBIA 0000

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

- d. 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, MUCHINGA PROVINCE, MPIKA  
12 DEGREES 24' 28.2"S  
32 DEGREES 10' 18.1"E
- e. Date wildlife is to be hunted:  
AUGUST 28, 2017

- f. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:  
SYLVIA VAN STADEN  
VAN STADEN SAFARIS (Z) LTD.  
PLOT 3, GREAT EAST RD. WATERFALLS, LUSAKA  
P.O. BOX 38498  
LUSAKA, CENTRAL PROVINCE, ZAMBIA 0000
- g. 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]:  
SYLVIA VAN STADEN  
SITATUNGA RANCHING & SAFARIS C/O VAN STADEN SAFARIS (Z) LTD.  
PLOT 7301 KAMBALA RD  
P.O. BOX 38498  
LUSAKA, CENTRAL PROVINCE, ZAMBIA 0000
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.
- a. 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: SYLVIA VAN STADEN  
Business Name: SITATUNGA RANCHING & SAFARIS C/O VAN STADEN SAFARIS (ZA) LTD  
Address: PLOT 7301 KAMBALA RD  
Address: P.O. BOX 38498  
City: LUSAKA  
State/Province: CENTRAL PROVINCE  
Country, Postal Code: ZAMBIA 0000

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. 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: \_\_\_\_\_



10. 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: Leanne LeMay Date: 04/12/2018  
WELL Worldwide, Atty In Fact

*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.*

11. 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).

for a  
**U.S. RESIDENT IMPORTER & EXPORTER**

Department of Homeland Security  
US Customs and Border Protection  
19 CFR 141.32

Phone# X

Cell Phone

Email# X

FOR SIGNATURE

A Sole Proprietorship  
A Partnership  
A Corporation  
A Limited Liability Company



KNOW ALL MEN BY THESE PRESENTS: That (3) X Lawrence Pickett (Grantor)

doing business as B+B Taxidermy under the laws of the State of (4) Louisiana, residing or having a principal

place of business at (5) X Houston, TX Delhi, LA (b) (6)

hereby constitutes and appoints WELL Worldwide Energy Logistics, Inc. to act through its officers, employees and specially designated agents which are duly authorized by said Grantor by power of attorney

As a true and lawful agent and attorney of the Grantor named above for and in the name, place and 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 such merchandise; to receive any merchandise deliverable to said Grantor;

To make endorsements on bills of lading conferring authority to transfer title; to make entry and collect drawback; and to make, sign, declare, or swear to any statement, supplemental statement, schedule, supplemental schedule, certificate of delivery, certificate of manufacture, certificate of manufacture 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, certificates, abstract, declaration, or other affidavit or document is intended for filing in any other 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 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 of which may be voluntarily given and accepted under applicable laws and regulations, consignee's and owner's declaration provided for in section 485 Tariff Act of 1930 amended or affidavits in connection with the entry or 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 by Grantor;

To grant powers of attorney on behalf of said Grantor to other Customs Brokers to act as said Grantor's agent; to receive, endorse and collect checks issued for Customs duty refunds in said Grantor's name drawn on the Treasurer of the United States;

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, 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 said agent and 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

(6) X Revoked

(click embossed seal date)

If Grantor is a partnership or LLC, signatory certifies that he/she has full authority to execute this instrument on behalf of Grantor and shall state the names of all members and/or directors on a separate addendum to this document, and said this power shall in no case have any force or effect beyond two years from the date of its execution.

Grantor further authorizes Grantee to act as its agent in signing or endorsing export documents, i.e. commercial invoices, shipper's export declarations, Automated Export System records, bills of lading, insurance certificates, drafts and any other documents necessary to the successful completion of any export transaction on its behalf.

If Grantor is a U.S. Principal Party in Interest (USPPI) in an export transaction then the Grantor/USPPI hereby certifies that all statements and information contained in the documentation provided to Grantee relating to exportation are true and correct. Furthermore, Grantor/USPPI understands that civil and criminal penalties may be imposed for making false or fraudulent statements or for the violation of any United States laws or regulation on exportation. Grantor/USPPI undertakes to determine any export license requirements and to obtain, for export purposes, any export license or other official authorization.

All services and transactions are subject to WELL's Terms and Conditions of Service (NOBFA 6/94) which are included in this document for which Grantor expressly acknowledges receiving a written copy. To the extent provided by law, WELL's liability as a Customs Broker is limited to \$50.00 (19 USC 1641(f)).

IN WITNESS WHEREOF, the said Grantor has caused these presents to be sealed and signed:

(signature)

(capacity) (7)

(if Duty Authorized Representative, supporting documentation must be provided)

(print name) (8)

(date) (9)

If you are the importer of record, paymaster or broker will not relieve you of liability for Customs charges (duties, taxes, or other debts owed Customs) in the event the charges are not paid by the importer. Therefore, if you pay by check, Customs charges may be paid with a separate check payable to the "Bureau of Customs and Border Protection" which shall be delivered to Customs by the broker (19 CFR 111.29). If you elect to make payment with a check made payable to the Bureau of Customs and Border Protection, arrangement must be made in advance.





**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 of Southern  
African Leopard and Namibian Southern White  
Rhinoceros**

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 <b>COPELAND</b>		1.b First Name <b>BRENDA</b>		1.c Middle Name/Initial	1.d Suffix
2. Date of Birth (mm/dd/yyyy)	3. Telephone Number <b>254-947-8994</b>	3.a Alternate Telephone Number <b>281-606-2400</b>		4. E-mail address <b>llilley@well-usa.com</b>	

**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>(b) (6)</b>				
1.b City <b>SALADO</b>	1.c State <b>TX</b>	1.d Zip code/Postal code <b>(b) (6)</b>	1.e County/Province	1.f Country <b>USA</b>
2.a Mailing address (include if different than physical address; include name of corporation if applicable) <b>WELL WORLDWIDE ENERGY LOGISTICS, LYNETTE LILLEY, 17401 ALDINE WESTFIELD RD</b>				
2.b City <b>HOUSTON</b>	2.c State <b>TX</b>	2.d Zip code/Postal code <b>77073</b>	2.e County/Province <b>HARRIS</b>	2.f Country <b>USA</b>

**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)  <i>Lynette Lilley, Atty In fact, Well Worldwide</i> <span style="float: right;"><b>04/12/2016</b></span>

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND  
NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** *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 4:** Certain hunting trophies, including leopard 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.

- Complete all questions on the application.
- Mark questions that are not applicable with "N/A".
- If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.
- 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 ATTACHED

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

LYNETTE LILLEY  
281-606-2400  
llilley@well-usa.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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):
- a. Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20.
- b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia  
Quantity:        (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).

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:

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

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

- d. 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, MUCHINGA PROVINCE, MPIKA

12 DEGREES 24' 28X2" S

32 DEGREES 10' 18.1" E

- e. Date wildlife is to be hunted:



- f. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:  
VAN STADEN SAFARIS (Z) LTD.  
PLOT 3, GREAT EAST RD, WATERFALLS, LUSAKA  
P.O. BOX 38498  
LUSAKA, CENTRAL PROVINCE, ZAMBIA
- g. 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]:  
SAME AS ABOVE

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.
- a. 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: SYLVIA VAN STADEN  
Business Name: VAN STADEN SAFARIS (Z) LTD.  
Address: PLOT 3, GREAT EAST RD, WATERFALLS, LUSAKA  
Address: P.O. BOX 38498  
City: LUSAKA  
State/Province: CENTRAL PROVINCE  
Country, Postal Code: ZAMBIA 0000

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. 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: \_\_\_\_\_

10. 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: \_\_\_\_\_

*Lynette Liley*  
*Atty In Fact, Well Worldwide*

Date: \_\_\_\_\_

*04/12/2018*

*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.*

11. 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).

**U.S. CUSTOMS POWER OF ATTORNEY  
for a  
U.S. RESIDENT IMPORTER & EXPORTER**

Department of Homeland Security  
US Customs and Border Protection  
19 CFR 141.32

Phone#

Cell Phone

Email

Check appropriate box(2)

- ☒ An Individual  
☐ A Sole Proprietorship  
☐ A Partnership  
☐ A Corporation  
☐ A Limited Liability Company



SS# (b) (6)

KNOW ALL MEN BY THESE PRESENTS: That (3) Jerry (b) (6) COPELAND (Grantor)

doing business as \_\_\_\_\_ under the laws of the State of (4) \_\_\_\_\_ (Full legal name of individual, partner, LLC, or corporation, with suffixes "d/b/a" as appropriate)

home address (5) X (b) (6) Salado, TX (b) (6) (residing or having a principal

hereby constitutes and appoints \_\_\_\_\_ through its officers, employees, or authorized agents which are duly authorized by said Grantee by power of attorney

As a true and lawful agent and attorney of the Grantor named above for and in the name, place and 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 such merchandise; to receive any merchandise deliverable to said Grantor;

To make endorsements on bills of lading conferring authority to transfer title; to make entry and collect drawback; and to make, sign, declare, or swear to any statement, supplemental statement, schedule, supplemental schedule, certificate of delivery, certificate of manufacture, certificate of manufacture 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, certificates, abstract, declaration, or other affidavit or document is intended for filing in any other 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 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 of which may be voluntarily given and accepted under applicable laws and regulations, consignee's and owner's declaration provided for in section 485 Tariff Act of 1980 amended or affidavits in connection with the entry or 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 by Grantor;

To grant powers of attorney on behalf of said Grantor to other Customs Brokers to act as said Grantor's agent; to receive, endorse and collect checks issued for Customs duty refunds in said Grantor's name drawn on the Treasurer of the United States;

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, 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 said agent and 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

(6) ☒ Revoked

(click arrow to select date)

If Grantor is a partnership or LLC, signatory certifies that he/she has full authority to execute this instrument on behalf of Grantor and shall state the names of all members and/or directors on a separate addendum to this document, and said the power shall in no case have any force or effect beyond two years from the date of its execution.

Grantor further authorizes Grantee to act as its agent in signing or endorsing export documents, i.e. commercial invoices, shipper's export declarations, Automated Export System records, bills of lading, insurance certificates, drafts and any other documents necessary to the successful completion of any export transaction on its behalf.

If Grantor is a U.S. Principal Party in Interest (USPPI) in an export transaction then the Grantor/USPPI hereby certifies that all statements and information contained in the documentation provided to Grantee relating to exportation are true and correct. Furthermore, Grantor/USPPI understands that civil and criminal penalties may be imposed for making false or fraudulent statements or for the violation of any United States laws or regulation on exportation. Grantor/USPPI undertakes to determine any export license requirements and to obtain, for export purposes, any export license or other official authorization.

All services and transactions are subject to WELL's Terms and Conditions of Service (NCBFFA 8/94) which are included in this document for which Grantor expressly acknowledges receiving a written copy. To the extent provided by law, WELL's liability as a Customs Broker is limited to \$50.00 (19 USC 1641(f)).

IN WITNESS WHEREOF, the said Grantor has caused these presents to be sealed and signed:

(signature) X Jerry (b) (6) Copeland  
(print name) (8) X Jerry Copeland

(capacity) (7)

(If Duty Authorized Representative, supporting documentation must be provided)

(date) (9) X 8/4/2015

If you are the importer of record, payment to the broker will not relieve you of liability for Customs charges (duties, taxes, or other debts owed Customs) in the event the charges are not paid by the broker. Therefore, if you pay by check, Customs charges may be paid with a separate check payable to the "Bureau of Customs and Border Protection" which shall be delivered to Customs by the broker (19 CFR 111.29). If you elect to make payment with a check made payable to the Bureau of Customs and Border Protection, arrangement must be made in advance.





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 1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

Type of Activity

**IMPORT OF SPORT-HUNTED TROPHIES OF BONTEBOK  
TROPHIES FROM SOUTH AFRICA**

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 <b>PICKETT</b>	1.b. First Name <b>LAWRENCE</b>	1.c. Middle Name/Initial <b>(b) (6)</b>	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number	3.a. Alternate Telephone Number	3.b. E-mail address

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

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

**Section C: All applicants complete address information**

1.a. Physical address (Street address, Apartment #, Suite #, or Room #: no P.O. Boxes) <b>(b) (6)</b>				
1.b. City <b>DELHI</b>	1.c. State <b>LA</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>
2.a. Mailing address (Include if different than physical address; include name of contact person if applicable) <b>WELL WORLDWIDE, ATTN: LYNETTE LILLEY, 17401 ALDINE WESTFIELD</b>				
2.b. City <b>HOUSTON</b>	2.c. State <b>TX</b>	2.d. Zip code/Postal code <b>77073</b>	2.e. County/Province <b>HARRIS</b>	2.f. Country <b>USA</b>

**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>Lynette Lilley, Atty In Fact, WELL Worldwide Energy</b> <span style="float: right;"><b>04/12/2018</b></span>	

Please continue to next page

**IMPORT OF SPORT-HUNTED BONTBOK TROPHIES from South Africa**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** The bontbok is listed as endangered under the Endangered Species Act. Applications for endangered species permits must be published in the Federal Register for a 30-day public comment period. Allow at least 90 days for the application to be processed.

**Note 4:** This application can only be used if you have hunted/will be hunting in South Africa. If you have or will be hunting in a different country, please use form 3-200-20

**Note 5:** *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:
  - 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;
  - 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
  - The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

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 ATTACHED

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

LYNETTE LILLEY, 281-606-2400, 11lilley@well-usa.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. How many Bontebok (*Damaliscus pygargus pygargus*) are you applying to import? Quantity: 1
- a. At the time of the application, the specimen(s) is:
- Alive                      Dead
- b. What is the approximate date of proposed take? \_\_\_\_\_
- c. What is the date you took the animal? august 30, 2017
- 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]:  
SAFARI TAXIDERM  
47 GOUD STREET, LABORIA  
POLOKWANE, RSA
5. ENTER the name and address of the landowner on whose property the bontebok was or will be taken:

Owners name: JOHAN MARITZ  
Farm Name: KALAHARI ORYX GAME RESERVE/WILDRESERVATT  
District: TWEETPOORT, UPINGTON  
Address: TWEETPOORT, UPINGTON, NORTHERN CAPE PROVINCE  
City: P.O. BOX 293 UPINGTON, NORTH CAPE 8800 RSA  
State/Province:  
Country, Postal Code:

Please be aware that the bontebok is listed in Appendix II of CITES. As such, you must obtain a CITES export permit from South Africa. If you are not exporting the trophy from South Africa directly to the United States, you will need to obtain a CITES Re-export certificate from the re-exporting country.

6. Attach a signed statement from the landowner giving you permission to cull a bontebok from their captive herd.
7. If available, provide a copy of the landowner's Certification of Registration for the bontebok herd. (Note: this is not a copy of the export permit or certificate issued by a South African province.) In order to meet the criteria for a permit under the Endangered Species Act, the bontebok must be culled from a ranch that has been certified by the Government of South Africa under their bontebok program. If the ranch is not registered, we may be unable to issue an import permit.

8. **Complete name and address** of overseas person or business shipping the trophy to you (this name will appear on the face of the permit).

Name: SAFARI TAXIDERMY  
Business Name: 47 GOUD STREET  
Address: LABORIA  
Address: POLOKWANE, RSA  
City:  
State/Province:  
Country, Postal Code:

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. **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**).

Taxidermist/Broker's signature: \_\_\_\_\_ Date: \_\_\_\_\_

10. **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**).

Applicant's signature: Reynolds Reiley Date: 04/12/2018

Atty In fact, Well Wounded Energy

*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 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).



**Biodiversity**  
**Northern Cape Province**



040 2017

Issued in terms of the provisions of: Regulation 23  
of the National Environmental Management Act  
Biodiversity Act 16 of 1994, Threatened  
Protected Species Regulations

SLHHS

YEAR

Issued in terms of the provisions of: Section 39  
and 41 of the Nature and Environmental  
Conservation Ordinance 19 of 1974

**GAME FARM HUNTING PERMIT / PERMISSION**  
**PERSONAL EFFECTS PERMIT / PERMISSION**

**LANDOWNER / PERMIT HOLDER**

Johan Frederik Maritz 7204035187088 - Physical Address: Tweeboom - Postal Address: PO Box 293, Upington, Northern Cape,  
8800 Upington Northern Cape Province 8800 RSA Home Phone: Mobile Phone: +27834069729 Fax Number

**GAME FARM / FACILITY**

Kalahari Oryx

**(i) CLIENT**

Hunting client full name: Lawrence (b) (6) Pickett  
id or Passport number: (b) (6)  
Physical address: (b) (6) Delhi Louisiana (b) (6)  
Vehicle Reg. Number:

**(ii) ARRIVAL**

(dd/mm/yyyy) 20/08/2017

**(iii) DEPARTURE**

(dd/mm/yyyy) 23/08/2017

**(iii) HUNTING OUTFITTER**

Name: JFW Houtzinger  
HC Number: 008/2010  
Tel No: 0825572304

**(v) PROFESSIONAL HUNTER**

Name: JN Koperheims  
PH Number: 07612016  
Tel No: 0824249195

**(iv) HUNTING WEAPON**

Rifle

**(vii) HUNTING METHOD**

Walk + Stalk

(v) SPECIES HUNTED	NUMBER AUTHORISED	NUMBER ACTUALLY HUNTED	(vi) SPECIES HUNTED	NUMBER AUTHORISED	NUMBER ACTUALLY HUNTED
Common Kudu	1	1	Black wildebeest	1	1
Spotted Kudu	1	1	Blue kudu	1	1
Dik-dik	1	1			
Topi	1	1			

**HUNTING PERIOD / ACTUAL DATE OF HUNTING**

from: 20/08/2017 to: 23/08/2017

**DECLARATION BY LANDOWNER / PERMIT HOLDER:**

- a) I hereby certify that the above mentioned hunter, legally hunted on the above mentioned farm or property, during the above mentioned period, the animals as specified in the table above.  
b) I hereby authorize the above mentioned hunter to buy, to remove, to convey or to transport the carcass / specimen from the above mentioned farm or property, to his / her residential / physical address.  
c) I hereby donate / give the carcasses / specimen to the above mentioned hunter / client.

Signature: Landowner / Permit Holder and Date

**DECLARATION BY HUNTER:**

I hereby take note of the following:

- a) that I can buy and hunt the above mentioned animals from the landowner  
b) that I am allowed to field dress, process, and transport the carcass and to temporarily possess the dead specimen or derivative thereof, for a maximum period of 1 (one) year calculated from the day of the hunt.  
c) that I must at least 1 (three) months before the expiry of the 1 (one) year period, apply for a POSSESSION permit from the Director or applicable provincial department issuing authority, in my province of residence. If still in possession of any carcass, derivative, part, specimen or trophy of the animal successfully hunted.  
d) that I will return the original "Game Farm Hunting Permit / Permission" together with my application for a possession permit

23/8/17

Signature: Hunter and Date

Signature of Issuing Authority

03 April 2014

Date of Issue

Department of Environment and Nature Conservation - 26 Long Street - Private Bag 9135, Kimberley 8307

(Tel) Tel: 053-507 7430 Fax: 053-5161 739

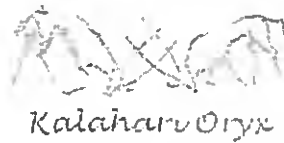
(Cell) Tel: 027-341 1775 Fax: 027-341

(Dial Area) Tel: 053-507 521 Fax: 053-521

(Internet) Tel: 053-712 3793 Fax: 053-711

(Uppt) Tel: 054-3322035 Fax: 054-33

**ORYX MANAGEMENT SERVICES(Pty) Ltd t/a**  
(Registration No. 2000/031111/07)



**KALAHARI ORYX GAME RESERVE/WILDERESERVAAT**

P.O. Box/Posbus 293 Upington 8800 South Africa/Suid-Afrika  
Tel: 0795297161/0824473700/0834069729  
Fax: 0866751616  
E-mail/E-pos: johan@kalahari-oryx.com

Tel No. 4200256321

August 24, 2017

To Whom it May Concern

**Permission to Hunt and Remove Bontebok from Kalahari Oryx**

This letter serves to confirm that permission was granted to Mr. Lawrence (b) (6) Pickett, Passport Number (b) (6), to hunt and remove as trophies various game species from Kalahari Oryx. These species are listed on the Certificate of Adequate Enclosure and permission was granted by way of permit Number Fauna 133/2014 (Game Farm Hunting Permit) as required by the Northern Cape Province Nature Conservation Department. This permit also serves as his permission to hunt as it is signed by the Land Owner, to hunt on Kalahari Oryx over the period 20/08/2017 – 23/08/2017.

Amongst others, Mr. Pickett was granted permission to hunt and to remove from Kalahari Oryx 1 Male Bontebok *Damaliscus Pygargus Pygargus* as a trophy. This animal was hunted on 22/08/2017.

The hunting of this specific bontebok ram will in no way endanger the future of the Bontebok on our property, shooting of the older males is done in the best interest for the survival of the Bontebok herd.

I therefore request you to issue a cities import permit for the abovementioned client

Yours sincerely,

Johan Maritz

# SOUTHERN AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

Duration of Hunt: Commenced 22 08 2017 Terminated 23 08 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 (MP)	Western Cape (WC)	Eastern Cape (EC)	Northern Cape (NC) <input checked="" type="checkbox"/>
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Post Permit to (Mark correct block with X)

**PROFESSIONAL HUNTER**

Name: JN Raubenheimer

Business Address: Kruisrivier Street 46  
Groenenendal, Durbanville  
Cape Town Code: 7550

ID No: 89 01 09 50 60 084

PH Permit No: 076/2016

Date: 22/08/2017 Signature: [Signature]

**CLIENT**

Name: Lawrence [Redacted]

Permanent Postal Address: [Redacted]

Delhi - Los Angeles Code: [Redacted]

Country: USA Tel: [Redacted]

Passport No: [Redacted]

Email: [Redacted]

Date: 22/08/2017 Signature: [Signature]

**HUNTING OUTFITTER** ☒

Name: JW Hartzenberg

Business Address: Westerdale Road  
Durbanville, Cape Town Code: 7550

I.D. No: 6901135055088

Tel No: 082 554 2304 Fax No: [Redacted]

HO Permit No: 008/2017

Date: 22/08/17 Signature: JW Hartzenberg

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/License No.	Date Killed/ Wounded	Species Killed or Wounded	No. Killed or Wounded	Sex F / M	Parts of Trophy to be Exported
Kalahari Oryx	Trompsburg	Oryx Management Services	0772/2017	21/08	White Rhino	1	X	2x Horns, 6x Bones, 4x Feet
"	"	"	133/2014	"	Steenbuck	1	X	S+H, Full Cape
"	"	"	"	"	Duiker	1	X	S+H, Full Cape
"	"	"	"	"	Tsessebe	1	X	S+H, Shoulder Cape, Back Skin
"	"	"	"	"	Black Wildebeest	1	X	S+H, SC, BS
"	"	"	"	22/08	Bontebok	1	X	S+H, SC, BS

RHINO HUNTED IN MY PRESENCE

FRONT HORN: 2A 7486/17/8.8 RH MIC: 4C 47150966

BACK HORN: 2A 7483/17/2.5 RH MIC: 4C 47254316

Address to which trophies are to be sent:

Country: Botswana Trophy Export Date (Estimate): Polakwane

Forward to Nature Conservation Authority where hunt took place  
Retain for a period of three years  
Taxidermist  
Remains in book

Conservation Levy  
Total: [Redacted]



for a  
**U.S. RESIDENT IMPORTER & EXPORTER**

Department of Homeland Security  
US Customs and Border Protection  
19 CFR 141.32

Phone#

Cell Phone

Email

ALL INFORMATION

A Sole Proprietorship

A Partnership

A Corporation

A Limited Liability Company



KNOW ALL MEN BY THESE PRESENTS: That (3) X

Lawrence Pickett (b) (6)

(Grantor)

(Full legal name(s) of individual, partners, LLC, or corporation, with fictitious "d/b/a" as appropriate)

doing business as B+B Taxidermy under the laws of the State of (4) Louisiana, residing or having a principal

place of business at (5) X Houston, TX (b) (6) Delhi, LA (b) (6)

hereby constitutes and appoints **WELL Worldwide Energy Logistics, Inc** to act through its officers, employees and specially designated agents which are duly authorized by said Grantor by power of attorney

As a true and lawful agent and attorney of the Grantor named above for and in the name, place and 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 such merchandise; to receive any merchandise deliverable to said Grantor;

To make endorsements on bills of lading conferring authority to transfer title; to make entry and collect drawback; and to make, sign, declare, or swear to any statement, supplemental statement, schedule, supplemental schedule, certificate of delivery, certificate of manufacture, certificate of manufacture 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, certificates, abstract, declaration, or other affidavit or document is intended for filing in any other 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 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 of which may be voluntarily given and accepted under applicable laws and regulations, consignee's and owner's declaration provided for in section 485 Tariff Act of 1980 amended or affidavits in connection with the entry or 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 by Grantor;

To grant powers of attorney on behalf of said Grantor to other Customs Brokers to act as said Grantor's agent; to receive, endorse and collect checks issued for Customs duty refunds in said Grantor's name drawn on the Treasurer of the United States;

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, 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 said agent and 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 forgoing power of attorney to remain in full force and effect until

(6) ☒ Revoked

(click arrow to select date)

If Grantor is a partnership or LLC, signatory certifies that he/she has full authority to execute this instrument on behalf of Grantor and shall state the names of all members and/or directors on a separate addendum to this document, and said the power shall in no case have any force or effect beyond two years from the date of its execution.

Grantor further authorizes Grantee to act as its agent in signing or endorsing export documents, i.e. commercial invoices, shipper's export declarations, Automated Export System records, bills of lading, insurance certificates, drafts and any other documents necessary to the successful completion of any export transaction on its behalf.

If Grantor is a U.S. Principal Party in Interest (USPPI) in an export transaction then the Grantor/USPPI hereby certifies that all statements and information contained in the documentation provided to Grantee relating to exportation are true and correct. Furthermore, Grantor/USPPI understands that civil and criminal penalties may be imposed for making false or fraudulent statements or for the violation of any United States laws or regulation on exportation. Grantor/USPPI undertakes to determine any export license requirements and to obtain, for export purposes, any export license or other official authorization.

All services and transactions are subject to WELL's Terms and Conditions of Service (NCBFFA 6/94) which are included in this document for which Grantor expressly acknowledges receiving a written copy. To the extent provided by law, WELL's liability as a Customs Broker is limited to \$50.00 (19 USC 1841(f)).

IN WITNESS WHEREOF, the said Grantor has caused these presents to be sealed and signed:

(signature)

(capacity) (7)

(if Duty Authorized Representative, supporting documentation must be provided)

(print name) (8)

(date) (9)

If you are the importer of record, payment to the broker will not relieve you of liability for Customs charges (duties, taxes, or other debts owed Customs) in the event the charges are not paid by the broker. Therefore, if you pay by check, Customs charges may be paid with a separate check payable to the "Bureau of Customs and Border Protection" which shall be delivered to Customs by the broker (19 CFR 111.29). If you elect to make payment with a check made payable to the Bureau of Customs and Border Protection, arrangement must be made in advance.







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: 1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

Type of Activity

**IMPORT OF SPORT-HUNTED TROPHIES OF BONTÉBOK  
TROPHIES FROM SOUTH AFRICA**

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 <b>WILBANKS</b>	1.b. First Name <b>DELBERT</b>	1.c. Middle Name/Initial	1.d. Suffix
2. Date of Birth (mm/dd/yyyy)	3. Telephone Number <b>(b) (6)</b>	3.a. Alternate Telephone Number	4. E-mail address

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

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

**Section C: All applicants complete address information**

1.a. Physical address (Street address, Apartment #, Suite #, or Room #: no P.O. Boxes) <b>(b) (6)</b>				
1.b. City <b>DELHI</b>	1.c. State <b>LA</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>
2.a. Mailing address (include if different than physical address, include name of contact person if applicable) <b>WELL WORLDWIDE, ATTN: LYNETTE LILLEY, 17401 ALDINE WESTFIELD RD.</b>				
2.b. City <b>HOUSTON</b>	2.c. State <b>TX</b>	2.d. Zip code/Postal code <b>77073</b>	2.e. County/Province <b>HARRIS</b>	2.f. Country <b>USA</b>

**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>Lynette Lilley, Atty In Fact, WELL Worldwide Energy 04/12/2018</b>	

Please continue to next page

**IMPORT OF SPORT-HUNTED BONTBOK TROPHIES from South Africa**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** The bontbok is listed as endangered under the Endangered Species Act. Applications for endangered species permits must be published in the Federal Register for a 30-day public comment period. Allow at least 90 days for the application to be processed.

**Note 4:** This application can only be used if you have hunted/will be hunting in **South Africa**. If you have or will be hunting in a different country, please use form 3-200-20

**Note 5:** *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:
  - 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;
  - 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
  - The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

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 ATTACHED
2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?  
LYNETTE LILLEY, 281-606-2400, 11111ley@well-usa.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. How many Bontebok (*Damaliscus pygargus pygargus*) are you applying to import? Quantity: 1
- a. At the time of the application, the specimen(s) is:
- Alive                      Dead
- b. What is the approximate date of proposed take? \_\_\_\_\_
- c. What is the date you took the animal? AUGUST 22, 2017
- 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]:  
SAFARI TAKSIDERMIE  
47 GOUD STREET, LABORIA  
POLOKWANE, RSA
5. ENTER the name and address of the landowner on whose property the bontebok was or will be taken:  
KALAHARI ORYX GAME RESERVE/WILDRESERVAAT  
Owners name: JOHAN MARITZ  
Farm Name: KALAHARI ORYX GAME RESERVE/WILDRESERVATT  
District: TWEIPOORT, UPINGTON  
Address: TWEIPOORT, UPINGTON, NORTHERN CAPE PROVINCE  
City: P.O. BOX 293 UPINGTON, NORTH CAPE 8800 RSA  
State/Province:  
Country, Postal Code:

Please be aware that the bontebok is listed in Appendix II of CITES. As such, you must obtain a CITES export permit from South Africa. If you are not exporting the trophy from South Africa directly to the United States, you will need to obtain a CITES Re-export certificate from the re-exporting country.

6. Attach a signed statement from the landowner giving you permission to cull a bontebok from their captive herd.
7. If available, provide a copy of the landowner's Certification of Registration for the bontebok herd. (Note: this is not a copy of the export permit or certificate issued by a South African province.) In order to meet the criteria for a permit under the Endangered Species Act, the bontebok must be culled from a ranch that has been certified by the Government of South Africa under their bontebok program. If the ranch is not registered, we may be unable to issue an import permit.

8. **Complete name and address of overseas person or business shipping the trophy to you (this name will appear on the face of the permit).**

Name: SAFARI TAXIDERMY  
Business Name: 47 GOUD STREET  
Address: LABORIA  
Address: POLOKWANE, RSA  
City:  
State/Province:  
Country, Postal Code:

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. **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).

Taxidermist/Broker's signature: \_\_\_\_\_ Date: \_\_\_\_\_

10. **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).

Applicant's signature: Lepotto Leiga Date: 04/12/2018

WELL Woldenick Energy, Atty In Fact

*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 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).



**Biodiversity**  
**Northern Cape Province**



041 // 2017

Issued in terms of the provisions of: Regulation 38  
of the National Environmental Management Act:  
Biodiversity Act 10 of 2004: Threatened of  
Protected Species Regulations

SERIES

YEAR

**GAME FARM HUNTING PERMIT / PERMISSION**  
**PERSONAL EFFECTS PERMIT / PERMISSION**

Issued in terms of the provisions of: Section 38  
and 41 of the Nature and Environmental  
Conservation Ordinance 19 of 1974

**LANDOWNER / PERMIT HOLDER**

Johan Frederik Maritz 7204035187088 - Physical Address: Tweespoort - Postal Address: PO Box 293, Upington, Northern Cape, 8800 Upington Northern Cape Province 8800 RSA Home Phone: Mobile Phone: +27834089729 Fax Number:

**GAME FARM / FACILITY**

Kalahari Oryx

<b>(I) CLIENT</b>					
Hunting client full name		Delbert (b) (6) Wilbanks			
ID or Passport number		(b) (6)			
Physical address		Delhi, Louisiana, USA.			
Vehicle Reg. Number					
<b>(II) ARRIVAL</b>					
(dd/mm/yyyy)		20/08/2017			
<b>(III) HUNTING OUTFITTER</b>					
Name		JW Hunterberg			
HC Number		008/2017			
Tel No.		0825542304			
<b>(IV) HUNTING WEAPON</b>					
Rifle					
<b>(V) SPECIES HUNTED</b>					
NUMBER AUTHORISED		NUMBER ACTUALLY HUNTED			
Nyalu		1		1	
Springbuck		1		1	
Eland		1		1	
White Springbuck		1		1	
<b>(VI) SPECIES HUNTED</b>					
NUMBER AUTHORISED		NUMBER ACTUALLY HUNTED			
Greenback		1		1	
Bontebok		1		1	
Black WB		1		1	
Kudu		1		1	
<b>(VII) HUNTING METHOD</b>					
Kudu Stalk					
<b>HUNTING PERIOD / ACTUAL DATE OF HUNTING</b>					
From (dd/mm/yyyy)		To (dd/mm/yyyy)			
20/08/2017		23/08/2017			

**DECLARATION BY LANDOWNER / PERMIT HOLDER:**

- a) I hereby certify that the above mentioned hunter, legally hunted on the above mentioned farm or property, during the above mentioned period, the animal/s as specified in the table above.  
b) I hereby authorize the above mentioned hunter to buy, to remove, to convey or transport the carcass / specimen from the above mentioned farm or property, to his / her residential / physical address.  
c) I hereby donate / give the carcass / specimen to the above mentioned hunter / client.

**DECLARATION BY HUNTER:**

- I hereby take note of the following:  
a) that I can buy and hunt the above mentioned animals from the landowner.  
b) that I am allowed to field dress, process, and transport the carcass and to temporarily possess the dead specimen or derivative thereof, for a maximum period of 1 (one) year calculated from the day of the hunt.  
c) that I 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 issuing authority, in my province of residence, if still in possession of any carcass, derivative, part, specimen or trophy of the animal successfully hunted.  
d) that I will return the original "Game Farm Hunting Permit / Permission" together with my application for a possession permit.

Signature - Landowner / Permit Holder and Date 23/08/2017

Signature - Hunter and Date 23/08/17

Signature of Issuing Authority

03 April 2014

Date of Issue

Signature of Permit Holder

Date of Signature

Department of Environment and Nature Conservation - 80 Long Street - Private Bag X 6102, Kimberley 8300

(HQ - Kby) Tel: 053-807 7430 Fax: 086 5151 769  
(Kuruman) Tel: 053-712 0702 Fax: 053-71

(Cal) Tel: 027-341 1779 Fax: 027-341  
(Up) Tel: 054-3322885 Fax: 054-33

(De Aar) Tel: 053-6310 601 Fax: 053-63



**ORYX MANAGEMENT SERVICES(Pty) Ltd t/a**  
(Registration No. 2000/031111/07)



*Kalahari Oryx*

**KALAHARI ORYX GAME RESERVE/WILDRESERVAAT**

P.O. Box/Posbus 293 Upington 8800 South Africa/Suid-Afrika  
Tel. 0795297161/ 0824473700/0834069729  
Fax 0866754646  
E-mail/E-pos: johan@kalahari-oryx.com

Vat No. 4200256321

August 24, 2017

To Whom it May Concern

**Permission to Hunt and Remove Bontebok from Kalahari Oryx**

This letter serves to confirm that permission was granted to Mr. Delbert (b) (6) Wilbanks, Passport Number (b) (6) to hunt and remove as trophies various game species from Kalahari Oryx. These species are listed on the Certificate of Adequate Enclosure and permission was granted by way of permit Number Fauna 133/2014 (Game Farm Hunting Permit) as required by the Northern Cape Province Nature Conservation Department. This permit also serves as his permission to hunt as it is signed by the Land Owner, to hunt on Kalahari Oryx over the period 20/08/2017 – 23/08/2017.

Amongst others, Mr. Wilbanks was granted permission to hunt and to remove from Kalahari Oryx 1 Male Bontebok *Damaliscus Pygargus Pygargus* as a trophy. This animal was hunted on 20/08/2017. The hunting of this specific bontebok ram will in no way endanger the future of the Bontebok on our property, shooting of the older males is done in the best interest for the survival of the Bontebok herd.

I therefore request you to issue a cities import permit for the abovementioned client.

Yours sincerely,

Johan Maritz

# SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION



No: 60975

**Professional Hunters' Association of South Africa**

Duration of Hunt: Commenced 20 / 08 / 2017 Terminated 23 / 08 / 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)	
------------------------	--	--------------------	--	-----------------	--	--------------------------	--	--------------------	--	---------------------	--	----------------------	--	----------------------	--	-----------------------	--

Post Permit to (Mark correct block with X)

Post Permit to (Mark correct block with X)

**PROFESSIONAL HUNTER**

Name: JN Rautenheimer

Business Address: Kreisnuiet Singel no 66  
Durbanville Graamstad  
Cape Town Code: 7550

ID No: 8901095060084

PH Permit No: 076/2016

Date: 23/08/2017 Signature: [Signature]

CLIENT

Name: Delbert Willbanks

Permanent Postal Address: Delhi, Louisiana

Country: USA

Passport No:

Email:

Date: 22/08/2017 Signature: D. Willbanks

HUNTING OFFITTER X

Name: T.W. Hartzberg

Business Address: Westerdale rd no 1  
Durhamville Cape Town Code: 7510

I.D. No: 69 011 350 640 88

Tel No: 082 594 2304 Fax No: \_\_\_\_\_

HO Permit No: 008/2017

Date: 22/08/2017 Signature: T.W. Hartzberg

[illegible]

**Address to which trophies are to be sent:**

Code: \_\_\_\_\_ Country: \_\_\_\_\_

**Trophy Export Date (Estimate):**

Polokwane

### Conservation Levy

Total:

Copies:	Client	Original	White
		1st Copy	Pink
	Hunting Outfitter	2nd Copy	Blue
	Taxidermist	3rd Copy	Green
	Professional Hunter	Last Copy	Yellow

Forward to Nature Conservation Authority where hunt took place  
Retain for a period of three years  
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.

U.S. CUSTOMS POWER OF ATTORNEY  
for a  
U.S. RESIDENT IMPORTER & EXPORTER

Department of Homeland Security  
US Customs and Border Protection  
10 CFR 141.32

Phone

Cell Phone

Email

Check appropriate box (2)

☒ An Individual

☐ Sole Proprietorship

☐ Partnership

☐ Corporation

☐ Limited Liability Company



KNOW ALL MEN BY THESE PRESENTS: That (3) X Delbert Wilbanks

(Grantor)

doing business as

(Full legal name(s) of individual, partner, LLC, or corporation, with fictitious "d/b/a" as appropriate)  
under the laws of the State of (4) Delhi, LA

(Residing or having a principal

home address (5) X (b) (6)

hereby constitutes and appoints WELL Worldwide Energy Logistics, Inc to act through (b) (6) and specially designated agents which are duly authorized by said Grantor by power of attorney

As a true and lawful agent and attorney of the Grantor named above for and in the name, place and 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 such merchandise; to receive any merchandise deliverable to said Grantor;

To make endorsements on bills of lading conferring authority to transfer title; to make entry and collect drawback; and to make, sign, declare, or swear to any statement, supplemental statement, schedule, supplemental schedule, certificate of delivery, certificate of manufacture, certificate of manufacture 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, certificates, abstract, declaration, or other affidavit or document is intended for filing in any other 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 exported with or without benefit of drawback or in connection with the entry, clearance, lading, unloading or navigation of any vessel or other means of conveyance owned or operated by said Grantor, and any and all bonds of which may be voluntarily given and accepted under applicable laws and regulations, consignee's and owner's declaration provided for in section 485 Tariff Act of 1980 amended or affidavits in connection with the entry or 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, unloading, or operation of any vessel or other means of conveyance owned or operated by Grantor;

To grant powers of attorney on behalf of said Grantor to other Customs Brokers to act as said Grantor's agent; to receive, endorse and collect checks issued for Customs duty refunds in said Grantor's name drawn on the Treasurer of the United States;

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, 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 said agent and 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

(6) ☒ Revoked

(click arrow to select date)

If Grantor is a partnership or LLC, signatory certifies that he/she has full authority to execute this instrument on behalf of Grantor and shall state the names of all members and/or directors on a separate addendum to this document, and said the power shall in no case have any force or effect beyond two years from the date of its execution.

Grantor further authorizes Grantee to act as its agent in signing or endorsing export documents, i.e. commercial invoices, shipper's export declarations, Automated Export System records, bills of lading, insurance certificates, drafts and any other documents necessary to the successful completion of any export transaction on its behalf.

If Grantor is a U.S. Principal Party in Interest (USPPI) in an export transaction then the Grantor/USPPI hereby certifies that all statements and information contained in the documentation provided to Grantee relating to exportation are true and correct. Furthermore, Grantor/USPPI understands that civil and criminal penalties may be imposed for making false or fraudulent statements or for the violation of any United States laws or regulation on exportation. Grantor/USPPI undertakes to determine any export license requirements and to obtain, for export purposes, any export license or other official authorization.

All services and transactions are subject to WELL's Terms and Conditions of Service (NCBFFA 0/94) which are included in this document for which Grantor expressly acknowledges receiving a written copy. To the extent provided by law, WELL's liability as a Customs Broker is limited to \$50.00 (19 USC 1641(f)).

IN WITNESS WHEREOF, the said Grantor has caused these presents to be sealed and signed:

(signature) X Delbert Wilbanks

(capacity) (7) \_\_\_\_\_

(If Duty Authorized Representative, supporting documentation must be provided)

(print name) (8) X Delbert Wilbanks

(date) (9) X 5/19/14

If you are the importer of record, payment to the broker will not relieve you of liability for Customs charges (duties, taxes, or other debts owed Customs) in the event the charges are not paid by the broker. Therefore, if you pay by check, Customs charges may be paid with a separate check payable to the "Bureau of Customs and Border Protection" which shall be delivered to Customs by the broker (19 CFR 111.20). If you elect to make payment with a check made payable to the Bureau of Customs and Border Protection, arrangement must be made in advance.





**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 OF BONTEBOK  
TROPHIES FROM SOUTH AFRICA**

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 <b>Cunningham</b>	1.b. First Name <b>Mike</b>	1.c. Middle Name/Initial	1.d. Suffix
2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number <b>281-606-2400</b>	4. E-mail address <b>jlanham@well-usa.com</b>

**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. Physical address (Business, home, or Room # no P.O. Boxes)					
1.b. City <b>Georgetown</b>	1.c. State <b>TX</b>	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country <b>USA</b>	
2.a. Mailing address (include if different than physical address; include zip code)					
2.b. City <b>Houston</b>	2.c. State <b>TX</b>	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country <b>USA</b>	

**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>Jmy Lanham</b> <b>Atty in fact Well Worldwide</b> <b>April, 19, 2018</b> Please continue to next page	



**IMPORT OF SPORT-HUNTED BONTEBOK TROPHIES from South Africa**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** The bontebok is listed as endangered under the Endangered Species Act. Applications for endangered species permits must be published in the Federal Register for a 30-day public comment period. Allow at least 90 days for the application to be processed.

**Note 4:** This application can only be used if you have hunted/will be hunting in South Africa. If you have or will be hunting in a different country, please use form 3-200-20

**Note 5:** *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:
  - 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;
  - 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
  - The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

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.

Envelope attached

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

Joy Lanham (281) 606-2400

jlanham@well-usa.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. How many Bontebok (*Damaliscus pygargus pygargus*) are you applying to import? Quantity: 1

a. At the time of the application, the specimen(s) is:

Alive

☒ Dead

b. What is the approximate date of proposed take? 3-6-17

c. What is the date you took the animal? 3-6-17

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]:

5. ENTER the name and address of the landowner on whose property the bontebok was or will be taken:

Owners name: Gun Brink  
Farm Name: Sandy Mount Park  
District: Fauresmith  
Address: PO Box 1, Fauresmith, 9780  
City:  
State/Province:  
Country, Postal Code: 9780

Please be aware that the bontebok is listed in Appendix II of CITES. As such, you must obtain a CITES export permit from South Africa. If you are not exporting the trophy from South Africa directly to the United States, you will need to obtain a CITES Re-export certificate from the re-exporting country.

6. Attach a signed statement from the landowner giving you permission to cull a bontebok from their captive herd.
7. If available, provide a copy of the landowner's Certification of Registration for the bontebok herd. (Note: this is not a copy of the export permit or certificate issued by a South African province.) In order to meet the criteria for a permit under the Endangered Species Act, the bontebok must be culled from a ranch that has been certified by the Government of South Africa under their bontebok program. If the ranch is not registered, we may be unable to issue an import permit.

8. **Complete name and address of overseas person or business shipping the trophy to you (this name will appear on the face of the permit).**

Name: African Trophy Exports  
Business Name:  
Address: 13 Wildesering Str  
Address:  
City: Elspark, Germiston  
State/Province: South Africa, 1418  
Country, Postal Code:

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. **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).

Taxidermist/Broker's signature: Jim Lanham Date: 4-18-18  
Atty in fact Well Worldwide

10. **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).

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 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).

**U.S. CUSTOMS POWER OF ATTORNEY**  
for a  
**U.S. RESIDENT IMPORTER & EXPORTER**

Department of Homeland Security  
US Customs and Border Protection  
19 CFR 141.32

Phone# [REDACTED]

Cell Phone# [REDACTED]

Email [REDACTED]

SS# [REDACTED]

Check appropriate box(2)

- ☒ An Individual  
☐ A Sole Proprietorship  
☐ A Partnership  
☐ A Corporation  
☐ A Limited Liability Company



KNOW ALL MEN BY THESE PRESENTS: That (3) Michael L. Cunningham (your name)

doing business as [REDACTED] under the laws of the State of (4) George town, TX. (residing or having a principal

home address (5) [REDACTED]

hereby constitutes and appoints **WELL Worldwide Energy Logistics, Inc** to act through its officers, employees and specially designated agents which are duly authorized by said Grantor by power of attorney

As a true and lawful agent and attorney of the Grantor named above for and in the name, place and 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 such merchandise; to receive any merchandise deliverable to said Grantor;

To make endorsements on bills of lading conferring authority to transfer title; to make entry and collect drawback; and to make, sign, declare, or swear to any statement, supplemental statement, schedule, supplemental schedule, certificate of delivery, certificate of manufacture, certificate of manufacture 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, certificates, abstract, declaration, or other affidavit or document is intended for filing in any other 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 exported with or without benefit of drawback or in connection with the entry, clearance, lading, unloading or navigation of any vessel or other means of conveyance owned or operated by said Grantor, and any and all bonds of which may be voluntarily given and accepted under applicable laws and regulations, consignee's and owner's declaration provided for in section 485 Tariff Act of 1980 amended or affidavits in connection with the entry or 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, unloading, or operation of any vessel or other means of conveyance owned or operated by Grantor;

To grant powers of attorney on behalf of said Grantor to other Customs Brokers to act as said Grantor's agent; to receive, endorse and collect checks issued for Customs duty refunds in said Grantor's name drawn on the Treasurer of the United States;

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, 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 said agent and 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

(6) ☒ Revoked

(click arrow to select date)

If Grantor is a partnership or LLC, signatory certifies that he/she has full authority to execute this instrument on behalf of Grantor and shall state the names of all members and/or directors on a separate addendum to this document, and said the power shall in no case have any force or effect beyond two years from the date of its execution.

Grantor further authorizes Grantee to act as its agent in signing or endorsing export documents, i.e. commercial invoices, shipper's export declarations, Automated Export System records, bills of lading, insurance certificates, drafts and any other documents necessary to the successful completion of any export transaction on its behalf.

If Grantor is a U.S. Principal Party in Interest (USPPI) in an export transaction then the Grantor/USPPI hereby certifies that all statements and information contained in the documentation provided to Grantee relating to exportation are true and correct. Furthermore, Grantor/USPPI understands that civil and criminal penalties may be imposed for making false or fraudulent statements or for the violation of any United States laws or regulation on exportation. Grantor/USPPI undertakes to determine any export license requirements and to obtain, for export purposes, any export license or other official authorization.

All services and transactions are subject to WELL's Terms and Conditions of Service (NCBFFA 8/94) which are included in this document for which Grantor expressly acknowledges receiving a written copy. To the extent provided by law, WELL's liability as a Customs Broker is limited to \$50.00 (19 USC 1841(f)).

IN WITNESS WHEREOF the said Grantor has caused these presents to be sealed and signed:

(signature) [Signature]

(capacity) (7) \_\_\_\_\_

(If Authorized Representative, supporting documentation must be provided)

(print name) (8) Michael L. Cunningham

(date) (9) 11-21-16

If you are the importer of record, payment to the broker will not relieve you of liability for Customs charges (duties, taxes, or other debts owed Customs) in the event the charges are not paid by the broker. Therefore, if you pay by check, Customs charges may be paid with a separate check payable to the "Bureau of Customs and Border Protection" which shall be delivered to Customs by the broker (19 CFR 111.29). If you elect to make payment with a check made payable to the Bureau of Customs and Border Protection, arrangement must be made in advance.

# SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

Duration of Hunt. Commenced: 3.06.17  
 Tick appropriate province block where hunt took place (separate sheet for each Province)

Terminated: 3.06.17

FS 002408

KwaZulu-Natal (KZN)	Free State (FS) <input checked="" type="checkbox"/>	Gauteng (GP)	Limpopo (LP)	North West (NW)	Mpumalanga (MP)	Western Cape (WC)	Eastern Cape (EC)	Northern Cape (NC)
---------------------	---	--------------	--------------	-----------------	-----------------	-------------------	-------------------	--------------------

Post permit To (mark correct block with X)

**PROFESSIONAL HUNTER**

Name: Van Robert Brink

Business Address: Sandy Mount Park Box 1 FAARRESMITH Code: 9978

I.D. No.: 7207315057087

PH Permit No.: 2016/561

Date: 3/6/17 Signature: [Signature]

**CLIENT**

Name: Mike Commeyan

Permanent Postal Address: WAARBURG TX

Code: [Redacted] Country: USA

Passport: [Redacted]

Tel: [Redacted]

Fax: [Redacted]

Date: 3/6/17 Signature: [Signature]

**HUNTING OUTFITTER**

Name: Van Robert Brink

Business Address: P.O. Box 1 FAARRESMITH Code: 9978

I.D. No.: 7207315057087

PH Permit No.: 2016/561

Date: 3/6/17 Signature: [Signature]

Farm Name Registration No.	Magisterial District	Name and I.D. Number of land Owner	Hunting Permit Certificate / Licence No	Date of Hunt		Species Killed	Number Killed	Sex		Part of Trophy to be Exported
				From	To			♂	♀	
SANDY MOUNT PARK	FAARRESMITH	L.J. FOURIE 5305135009080	A11438 01/36453 50692217879 01/36451	3/6	3/6	IMPALA	1	✓		GRASSY SKIN, HORN
				"	"	BONTABON	1	✓		" " "
				"	"	LECHWE	1	✓		" " "
				"	"	SABLE	1	✓		" " "

Copies Client Hunting Outfitter Original 1st copy White Pink Forward to Nature Conservation authority where hunt took place  
 2nd copy Blue Retain for a period of three years  
 Professional Hunter Last copy Green Retain in book

Address to which export permit is to be sent

WAARBURG - KRUGER NATIONAL PARK  
 Code

Provinsie Oranje-Vrystaat  
**JAGLISENSIE**Orange Free State Province  
**HUNTING LICENCE**Lisensiegeld  
Licence FeeDatumstempel  
Date StampAlgemene inligting aan lisensiehouer  
verskyn op keersy**A 11438**General information to holder of  
licence appears on reverse.

Persoonlike besonderhede van lisensiehouer

Personal details of holder of licence

Van en volle  
voornaam(name)

MIKE CRAWNINGHAM

Surname and  
full name(s)

Woonadres

WALBURG

Residential address

TEXAS [REDACTED] USA

Kragtens die Ordonnansie op Natuurbewaring (Nr.8) van 1969, word die houer van hierdie lisensie gemagtig om in die Provinsie O.V.S. gewone wild te jag. Hierdie lisensie is slegs geldig indien dit deur die lisensiehouer onderteken is, is nie oordraagbaar nie en verval op 31 Desember 2012.

In terms of Nature Conservation Ordinance (No.8) of 1969 the holder of this licence is hereby authorised to hunt ordinary game in the O.F.S. Province. This licence is only valid if signed by the licence holder, is not transferable and expires on 31 December 2012.

Handtekening van lisensiehouer

Signature of holder of licence

Ontvangs van voorgeskrywe lisensiegeld word hiermee erken.

Receipt of prescribed licence fee is hereby acknowledged

Handtekening van die persoon deur  
die Administrateur gemagtig om lisensies uit te reikSignature of the person authorised by the  
Administrator to issue licences

LANDOWNER'S PERMISSION TO HUNT

HUNTING RIGHTS

NAME: SANDS MOUNT PARK

ADDRESS: P.O. Box 1, FAURESMITH . 9780

FARM: SANDY MOUNT PARK

MAGISTRAL DISTRICT: FAURESMITH

EXEMPTION NUMBER: 1007/35599

I, GILL BINK of the above address grant hunting rights  
To

Name: MICHAEL CUNNINGHAM

Address: [REDACTED] GEORGETOWN TEXAS, USA

Tel/Fax: [REDACTED] Passport no: \_\_\_\_\_

PARTICULARS OF GAME HUNTED:

Species	Number	Sex	Other Details
1	<u>BONTESK</u>		
2			
3	<u>IMPALA</u>		
4			
5	<u>LECHWE</u>		
6			
7	<u>SABRE</u>		
8			
9			
10			

PERIOD OF HUNTING RIGHTS

DATE From ...01/08/2016..... To .....31/11/2017.....

LANDOWNER'S SIGNATURE: [Signature] DATE ...31/8/16

HUNTING OUTFITTER'S SIGNATURE: [Signature] DATE ...31/8/16.....



# The department of economic development, tourism and environmental affairs



**the detea**

The department of economic development,  
tourism and environmental affairs  
**FREE STATE PROVINCE**

98 Zastron Street  
Agriculture Building  
Third Floor  
Bloemfontein  
9300  
Free State  
South Africa

Permit Office  
Private Bag X 20801  
Bloemfontein  
9300  
Tel: 051-400 9527/26  
Fax: 051-400 9523



## Permittee Details

7207315057087

Gerhardus Van Niekerk Brink

Sandt Mount Park

Fauresmith

9978

Box 1

Tel:

Fax:

vella@sandymountpark.co.za

Cell: 072-129 1920

**This Permit is issued in terms of the Biodiversity Act 10 of 2004 ( Threatened or Protected Species Regulations ) and in Terms of Nature Conservation Ordinance no 8 of 1969, permission is hereby granted to the holder of this permit to;**

- Certificate of Adequate Fencing

Particulars of property / fencing of: The whole farm mentioned down below:

Deed of Transport Number: T15740/2011

Name of Farm: Sandt Mount Park

Size of Enclosure: 15000 ha

Farm Number: 641, 1157, 25, 1126, 5

District: fFauresmith

Property

Permittee's Signature 	Approved on behalf of the MEC economic development, tourism and environmental affairs . 	
Expiry Date 2019-10-31	Permit Number 1007/35599	Date Issued 2016-10-13
Return Permit After Expiry Date	Cynthia Seqhobane	

uhGhkheV3dp9 mVdtVNkVspGhr9ar5nhVVrVriN

Species	Free Living Number	Marking System Type	Marking System Number
1. Springbuck	300		
2. Springbuck-black	15		
3. Springbuck-copper	45		
4. Springbuck-kalahari	800		
5. Blesbuck	27		
6. Black Wildebeest	30		
7. Blue Wildebeest	213		
8. Red Hartebeest	237		
9. Waterbuck	185		
10. Gemsbuck	58		
11. Impala	685		
12. Kudu	420		
13. Plains Zebra	91		
14. Buffalo-cape	70		
15. Common Reedbuck	50		
16. Mountain Reedbuck	300		
17. Eland	300		
18. Common Duiker	50		
19. Red Lechwe	78		
20. Steenbuck	50		
21. Grey Rhebuck	15		
22. Bushbuck	15		
23. Ostrich	30		
24. Warthog	250		
25. Roan	48		
26. Sable	80		
27. Tsessebe	26		
28. Giraffe	5		
29. Bontebok (pure tested)	40		
30. Nyala	128		

**Subject to the following conditions**

**Standard Conditions**

1. In the case of Black and Blue Wildebeest being kept together, they may not leave the farm alive.
2. The permit is invalid unless all requirements of any other legislation in respect of the act mentioned are complied with.
3. This permit is invalid if it is not signed by the permittee and is not transferable.
4. This permit is only valid in its original form.
5. If you intend to add any game species additional to those specified on this certificate, this Department must be notified in writing.
6. This certificate is only valid for game species as specified on this certificate.
7. A register of alterations in game numbers and marking systems must be kept by the owner on the table provided.
8. This Department must be informed if the fencing/camp as inspected by the investigating officer is altered in any way, or alterations are intended.

**Results for Bontebok  
(WC BCTUP)**



National Research  
Foundation

National Zoological Gardens  
of South Africa

Applicant: Mr CVN Brink  
Farm: Grapfontein, Fauresmith  
Veterinarian: Dr C Mou  
Conservation official: W Geyer  
Email: rykie@sandymountpark.co.za

Enquiries: Dr Desiré lee Dalton  
Email: [desire@nzg.ac.za](mailto:desire@nzg.ac.za)  
Tel: +27 12 328 3265

Date: 06 April 2016

Herewith are the results of the 9 samples received for genetic testing of bontebok to detect hybrid animals. According to the DNA marker set typed, as compiled through research for the detection of possible hybrid animals the following results were obtained from an assignment test for bontebok and blesbok:

Sample No.	Microchip No.	Lab No.	Final Result
Pink 601	7110363A70	BB8904	Bontebok
Pink 602	7110363D27	BB8905	Bontebok
1	7110364453	BB8906	Bontebok
2	7110363175	BB8907	Bontebok
3	7110362343	BB8908	Bontebok
Pink 603	7110362572	BB8909	Bontebok
Pink 604	7110366226	BB8910	Bontebok
4	7110364C0D	BB8911	Bontebok
5	7110364D18	BB8912	Bontebok

<sup>1</sup> = Bontebok – 100% pure bontebok as determined by the nuclear test, using microsatellite markers and incorporating a 90% threshold.

<sup>2</sup> = Hybrid – animals below the threshold for bontebok DNA. These animals pose a high risk to the pure bontebok population.

<sup>3</sup> = Blesbok – 100% pure blesbok as determined by the nuclear test, using microsatellite markers.

We thank you for your support and hope to be of service in the future.



Yours sincerely,  
Dr Désiré Lee Dalton

**DISCLAIMER:**

The National Zoological Gardens of South Africa is a declared National research facility under the National Research Foundation that conducts research as part of our mandate. All results thus may be used for this purpose.

Whilst every effort is made in ensuring the accuracy of results provided following sample testing, due to the nature of ongoing research in the field of DNA and best practices and acceptable thresholds, the National Zoological Gardens of South Africa (NZG) does not accept liability for any loss or damage suffered by sample providers arising out of the use of or reliance on the reports of the sample tests conducted, unless such loss is caused by the negligence or wilful act or omission of any employee of the NZG. In no event will the NZG be liable for any indirect or consequential loss or damage whatsoever arising from the use or reliance on the sample test reports.



REPUBLIC OF SOUTH AFRICA

Department of Environmental Affairs

Issuing Authority: Department of Environmental Affairs, Directorate: Biosecurity Services, Private Bag X 4300, Cape Town  
14 Loop Street, Cape Town 8001 Tel: 021 441 2741 E-mail: AISEc@doea.gov.za

THIS PERMIT IS ISSUED IN TERMS OF CHAPTER 7 OF THE NATIONAL ENVIRONMENTAL  
MANAGEMENT, BIODIVERSITY ACT 2004 (ACT 10 OF 2004) (AS AMENDED) READ TOGETHER WITH  
THE ALIEN AND INVASIVE SPECIES REGULATIONS, 2014 (AS AMENDED)

PERMIT FOR RESTRICTED ACTIVITY OF ALIEN SPECIES OF LISTED INVASIVE SPECIES

Permit Holder Details:

Name: Gerhardus van Niekerk Brink

I.D/ Company Registration number: 7207315057087

Address: Sandy Mount Park Fauresmith 9978

Permit number: 5069247879

Date issued: 19/05/2015

Expiry date: 08/05/2020

Amount Paid: R100.00

Exporter/Supplier/Seller/Trader details:

Premises where restricted activity will be carried out:

Name: N/A

Physical Address: Sandy Mount Park Fauresmith 9978

Address: N/A

Permission is hereby granted to the Permit Holder for the following: Possession/ Breed/ Sell under the attached permit conditions.

Species details

Scientific Name	Common Name	Quantity	Note
<i>Kobus leche leche</i>	Red Lechwe	80	Species of unknown gender

Permit issued by: KHATHUNDELO NELUMALLI

Signature:

Place: CAPE TOWN

Official stamp







APR 25 2018



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

OMB No 1018-0093  
Expires 02/28/2014

# Federal Fish and Wildlife Permit Application Form

**Return to:** Division of Management Authority (DMA)  
U.S. Fish and Wildlife Service  
4401 N. Fairfax Drive, Room 212  
Arlington, VA 22203  
1-800-358-2104 or 703-358-2104

**Type of Activity:**  
**Import of Sport-hunted Trophies of**  
**Southern African Leopard, African Elephant, and**  
**Namibian Southern White Rhinoceros**

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 <b>ZILMER</b>	1 b. First name <b>JOHN</b>	1 c. Middle name/initial <b>(b) (6)</b>	1 d. Suffix
2 a. Telephone number <b>(b) (6)</b>		2 b. Alternate telephone number <b>(b) (6)</b>	
2 c. Fax number <b>(b) (6)</b>		2 d. E-mail address <b>(b) (6)</b>	
3. Affiliation/Doing business as (see instructions)			

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	
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>(b) (6)</b>			
1 b. City <b>GLENMOORE</b>	1 c. State <b>PA</b>	1 d. Zip code/Postal code <b>(b) (6)</b>	1 e. Country <b>USA</b>
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. 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. Federal, tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in Instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue <b>15US84275 B/9</b> No <input type="checkbox"/>	
3. Certification. I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable provisions of Chapter B of Part 13 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>(b) (6)</b>	
Signature of applicant/person responsible for permit (No photocopied or stamped signatures)	Date of signature (mm/dd/yyyy) <b>4/17/2018</b>

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

Note 1: If you hold an import permit for a 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), [www.fws.gov/forms] and return your original permit with that form.

Note 2: The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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.

Please provide the following information. Complete all pages of the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). Note: once imported, ivory can not be re-exported.

Southern white rhinoceros (*Ceratotherium simum simum*) Quantity: \_\_\_\_\_ (Import permit is not required for trophies harvested in South Africa)

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

- Country and place (area, region, or ranch AND nearest city) where wildlife is to be taken from the wild:
- Date wildlife is to be hunted:
- Description of the trophy and/or parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn):

3. IF THE ANIMAL IS DEAD, please enter the following:

- Country and place (area, region, or ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible): LUKWATI SOUTH GAME RESERVE, TANZANIA  
50741927E03223266 (COORDINATES)
- Date wildlife was hunted: 8/26/2017
- Description and size of the trophy and/or parts (e.g., skin, skull, shoulder mount, life size mount, claws, horn): SKIN & SKULL
- The current location of the trophy (address and country):  
MICHEL MANTHEAKIS SAFARIS LTD  
P.O. BOX 354  
DAR ES SALAAM, TANZANIA

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

Name: MICHEL MANTHEAKIS

Address: P.O. BOX 354

City/Country DAR ES SALAAM, 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., 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

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 (disregard no. 7)

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 (b) (6) be re-exported.

Applicant's signature: \_\_\_\_\_ Date: 4/17/2018

8. Have you obtained all required federal, or foreign government approval(s) to conduct the activity you propose? (Be aware that there may be other requirements necessary to conduct this activity such as a hunting license or collection permit.) Yes ☒ (provide a copy of the approval(s)) Have applied ☐ Not required ☐

9. Enter the U.S. port through which the [export/re-export/import] will occur. SEATTLE, USA  
(All wildlife, including parts and products, must be declared to and inspected by a Wildlife Inspector from the U.S. Fish and Wildlife Service Office of Law Enforcement during importation. A list of designated ports (where an inspector is posted) is available from [http://www.fws.gov/le/ImpExp/Contact\\_Info\\_Ports.htm](http://www.fws.gov/le/ImpExp/Contact_Info_Ports.htm).)

10. Address where you wish permit mailed (if different than page 1):

11. If you wish the permit to be delivered by means other than regular mail, provide an air bill, pre-paid envelope, or billing information:

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

JOHN (b) (6) ZILLMER

(b) (6)





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

OMB No. 1018-0093  
Expires 02/28/2014

# Federal Fish and Wildlife Permit Application Form

**Return to:** Division of Management Authority (DMA)  
U.S. Fish and Wildlife Service  
4401 N. Fairfax Drive, Room 212  
Arlington, VA 22203  
1-800-358-2104 or 703-358-2104

**Type of Activity:**  
**Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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 <b>ZILLMER</b>	1 b. First name <b>DAVID</b>	1 c. Middle name/initial <b>(b) (6)</b>	1 d. Suffix
2 a. Address (Street address, Apartment #, Suite #, or Room #, or P.O. Box) <b>(b) (6)</b>		2 b. Doing business as (see instructions)	
3 a. Telephone number <b>(b) (6)</b>	3 b. Alternate telephone number <b>(b) (6)</b>	3 c. Fax number <b>(b) (6)</b>	3 d. E-mail address <b>(b) (6)</b>

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	
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 #, or P.O. Box) <b>(b) (6)</b>					
1 b. City <b>EAGLE RIVER</b>	1 c. State <b>WI</b>	1 d. Zip code/Postal code <b>(b) (6)</b>	1 e. County/Province	1 f. Country <b>USA</b>	
2 a. Mailing Address (include if different than physical address, include name or 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. Federal, tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2 Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3 Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts of Chapter 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>(b) (6)</b> <b>David Zillmer</b> Signature (in ink of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) <b>4/17/2018</b>	

Please continue to next page



**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

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Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). Note: once imported, ivory can not be re-exported.

Southern white rhinoceros (*Ceratotherium simum simum*) Quantity: \_\_\_\_\_ (Import permit is not required for trophies harvested in South Africa)

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

- Country and place (area, region, or ranch AND nearest city) where wildlife is to be taken from the wild:
- Date wildlife is to be hunted:
- Description of the trophy and/or parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn):

3. IF THE ANIMAL IS DEAD, please enter the following:

- Country and place (area, region, or ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible): LUKWATI SOUTH GAME RESERVE, TANZANIA  
57°40'48.33E-32°16'15-34 COORDINATES
- Date wildlife was hunted: 8/27/2017
- Description and size of the trophy and/or parts (e.g., skin, skull, shoulder mount, life size mount, claws, horn): SKIN & SKULL
- The current location of the trophy (address and country):  
MICHEL MANTHEAKIS SAFARI'S  
P.O. BOX 354  
DAR ES SALAAM, TANZANIA



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

Name: MICHEL MANTHEAKIS

Address: P.O. BOX 354

City/Country DAR ES SALAAM, 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., 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

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 (disregard no. 7).

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 (b) (6) exported.

Applicant's signature: \_\_\_\_\_

Date: 4/17/2018

8. Have you obtained all required local, Federal, or foreign government approval(s) to conduct the activity you propose? (Be aware that there may be other requirements necessary to conduct this activity such as a hunting license or collection permit.) Yes ☒ (provide a copy of the approval(s)) Have applied ☐ Not required ☐

9. Enter the U.S. port through which the [export/re-export/import] will occur. SEATTLE, USA  
(All wildlife, including parts and products, must be declared to and inspected by a Wildlife Inspector from the U.S. Fish and Wildlife Service Office of Law Enforcement during importation. A list of designated ports (where an inspector is posted) is available from [http://www.fws.gov/le/ImpExp/Contact\\_Info\\_Ports.htm](http://www.fws.gov/le/ImpExp/Contact_Info_Ports.htm).)

10. Address where you wish permit mailed (if different than page 1):

11. If you wish the permit to be delivered by means other than regular mail, provide an air bill, pre-paid envelope, or billing information:

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

DAVID ZILLMER

(b) (6)



APR 25 2018

OMB No. 1018-0093  
Expires 02/28/2014

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

**Federal Fish and Wildlife Permit Application Form**

**Return to:** Division of Management Authority (DMA)  
U.S. Fish and Wildlife Service  
4401 N. Fairfax Drive, Room 212  
Arlington, VA 22203  
1-800-358-2104 or 703-358-2104

**Type of Activity:**  
**Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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 <b>CROWN</b>		1.b. First name <b>DENNIS</b>		1.d. Suffix (b) (6)	
(b) (6)		(b) (6)		(see instructions)	
(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		
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)					
Suite #, or Room #, no P.O. Boxes)					
1.e. State <b>MA</b>		1.f. Country <b>USA</b>		(b) (6)	
2.a. Mailing Address (include if different than physical address; include name)					
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. Federal, tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))					
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue _____ No <input type="checkbox"/>					
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.					
Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures)				Date of signature (mm/dd/yyyy) <b>04/17/2018</b>	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

Note 1: If you hold an import permit for a 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), [www.fws.gov/forms] and return your original permit with that form.

Note 2: The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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.

Please provide the following information. Complete all pages of the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). Note: once imported, ivory can not be re-exported.

Southern white rhinoceros (*Ceratotherium simum simum*) Quantity: \_\_\_\_\_ (Import permit is not required for trophies harvested in South Africa)

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

a. Country and place (area, region, or 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/or parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn):

N/A

3. IF THE ANIMAL IS DEAD, please enter the following:

a. Country and place (area, region, or ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

LUKWATI SOUTH G.R. 36M0420046 UTM 9153658

b. Date wildlife was hunted: 08/19/2017

c. Description and size of the trophy and/or parts (e.g., skin, skull, shoulder mount, life size mount, claws, horn):

LEOPARD SKIN! SKULL

d. The current location of the trophy (address and country):

MICHEL MANTHEAKIS SAFARI'S LTD  
PO BOX 354  
DAR ES SALAAM  
TANZANIA

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

Name: MICHEL MANTHEAKIS SAFARI'S LTD

Address: PO BOX 354

City/Country DAR ES SALAAM 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., 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

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 (disregard no. 7).

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: 04/17/2018

8. Have you obtained all required local, Federal, or foreign government approval(s) to conduct the activity you propose? (Be aware that there may be other requirements necessary to conduct this activity such as a hunting license or collection permit.) Yes ☐ (provide a copy of the approval(s)) Have applied ☐ Not required ☐

9. Enter the U.S. port through which the [export/re-export/import] will occur. SEATTLE WASHINGTON  
(All wildlife, including parts and products, must be declared to and inspected by a Wildlife Inspector from the U.S. Fish and Wildlife Service Office of Law Enforcement during importation. A list of designated ports (where an inspector is posted) is available from [http://www.fws.gov/le/ImpExp/Contact\\_Info\\_Ports.htm](http://www.fws.gov/le/ImpExp/Contact_Info_Ports.htm).)

10. Address where you wish permit mailed (if different than page 1):

SAME AS PAGE 1

11. If you wish the permit to be delivered by means other than regular mail, provide an air bill, pre-paid envelope, or billing information:

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

DENNIS CRONIN

(b) (6)







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 OF BONTEBOK  
TROPHIES FROM SOUTH AFRICA**

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 <b>Williams</b>	1.b. First Name <b>Ronald</b>	1.c. Middle Name/Initial <b>(b) (6)</b>	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number	3.a. Alternate Telephone Number	3.b. E-mail address

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

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

**Section C: All applicants complete address information**

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) <b>(b) (6)</b>			
1.b. City <b>Midland</b>	1.c. State <b>Texas</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. Country/Province <b>USA</b>
2.a. Mailing address (Include if different than physical address; include name of contact person if applicable) <b>N/A</b>			
2.b. City <b>N/A</b>	2.c. State <b>N/A</b>	2.d. Zip code/Postal code <b>N/A</b>	2.e. Country/Province <b>N/A</b>
2.f. Country <b>N/A</b>			

**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>[Signature]</b> <b>4-18-2018</b>	
Please continue to next page	

**IMPORT OF SPORT-HUNTED BONTBOK TROPHIES from South Africa**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit to the address on page one.**

**Note 2:** 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:** The bontbok is listed as endangered under the Endangered Species Act. Applications for endangered species permits must be published in the Federal Register for a 30-day public comment period. Allow at least **90 days** for the application to be processed.

**Note 4:** This application can only be used if you have hunted/will be hunting in **South Africa**. If you have or will be hunting in a different country, please use form [3-200-20](#)

**Note 5:** *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:
  - 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;
  - 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
- The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

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. N/A
2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?  
 Ronnie Williams  
 (b) (6) (b) (6) (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. How many Bontebok (*Damaliscus pygargus pygargus*) are you applying to import? Quantity: 1

a. At the time of the application, the specimen(s) is:

Alive

☒ Dead

b. What is the approximate date of proposed take? N/A

c. What is the date you took the animal? April 27, 2018

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]:

Tam Safaris  
Spekboomberg, South Africa

5. ENTER the name and address of the landowner on whose property the bontebok was or will be taken:

Owners name: Mr. Irvin Tam  
Farm Name: Tam Safaris  
District: Cradock, Eastern Cape  
Address: Spekboomberg  
City: Cradock  
State/Province:  
Country, Postal Code: 5880

Please be aware that the bontebok is listed in Appendix II of CITES. As such, you must obtain a CITES export permit from South Africa. If you are not exporting the trophy from South Africa directly to the United States, you will need to obtain a CITES Re-export certificate from the re-exporting country.

6. Attach a signed statement from the landowner giving you permission to cull a bontebok from their captive herd.
7. If available, provide a copy of the landowner's Certification of Registration for the bontebok herd. (Note: this is not a copy of the export permit or certificate issued by a South African province.) In order to meet the criteria for a permit under the Endangered Species Act, the bontebok must be culled from a ranch that has been certified by the Government of South Africa under their bontebok program. If the ranch is not registered, we may be unable to issue an import permit.

8. **Complete name and address of overseas person or business shipping the trophy to you (this name will appear on the face of the permit).**

Name: Tam Farms  
Business Name: TAM Safari S  
Address: 77 Frere ST.  
Address:  
City: Cradock  
State/Province:  
Country, Postal Code: 5880

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. **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).

Taxidermist/Broker's signature: \_\_\_\_\_

N/A

Date: \_\_\_\_\_

N/A

10. **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).

Applicant's signature: \_\_\_\_\_

[Signature]

Date: \_\_\_\_\_

4-18-18

*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 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).

Po Box 822  
Cradock, 5880,  
South Africa

77 Frere Street,  
Cradock 5880  
South Africa



Tel: +27 48 881 1053  
Irvin: +27 82 652 6610  
Peter: +27 82 412 6766  
Stephen: +27 72 155 0570  
info@tamsafaris.com

www.tamsafaris.com

24 March 2018

**To Whom It May Concern:**

This letter serves to confirm that; Mr Ronald (b) (6) Williams; Passport # (b) (6)

Address: (b) (6)

Midland, Texas

(b) (6)

USA

Will be hunting in South Africa with Tam Safari's in the Eastern Cape during March 2018.

He is granted permission to hunt one excess Bontebok from the registered herd on the ranch, Spekboomberg, Cradock, South

Africa.

Ranch: +27 488 811 053

Mobile: +27 826 526 610

Sincerely

Irvin Tam



***Certificate of Registration***

***BONTEBOK HERD***



***It is hereby certified that the  
Bontebok herd on  
the property Spekboomberg, of  
Mr.Irvin Tam,  
in the Cradock district of the Eastern Cape,  
South Africa, is certified as pure on the  
13 May 2003***

***Presented to Mr.Irvin Tam  
Date: 13 May 2003***

  
***For Chief Director: Environmental Affairs***

***Issued by: Department of Economic Affairs, Environment and Tourism  
Province of the Eastern Cape***





APR 28 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 OF BONTBOK  
TROPHIES FROM SOUTH AFRICA**

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 <b>KIK</b>	1 b. First Name <b>AARON</b>	1 c. Middle Name/Initial [REDACTED]	1 d. Suffix -
2. Date of Birth (mm/dd/yyyy) [REDACTED]	3. Telephone Number [REDACTED]	3 a. Alternate Telephone Number -	4. E-mail address [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) [REDACTED]				
1 b. City <b>Lowell</b>	1 c. State <b>MI</b>	1 d. Zip code/Postal code [REDACTED]	1 e. County/Province [REDACTED]	1 f. Country <b>US</b>
2 a. Mailing address (include if different than physical address; include name of contact person if applicable) [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 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>Aaron Kik</b> <b>04/16/2018</b>

Please continue to next page

**IMPORT OF SPORT-HUNTED BONTBOK TROPHIES from South Africa**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** The bontbok is listed as endangered under the Endangered Species Act. Applications for endangered species permits must be published in the Federal Register for a 30-day public comment period. Allow at least 90 days for the application to be processed.

**Note 4:** This application can only be used if you have hunted/will be hunting in **South Africa**. If you have or will be hunting in a different country, please use form [3-200-20](#)

**Note 5:** *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:
  - 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;
  - 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
  - The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

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)?

Aaron Kik, (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.

— NA —

4. How many Bontebok (*Damaliscus pygargus pygargus*) are you applying to import? Quantity: 1
- a. At the time of the application, the specimen(s) is:
- ☒ Alive ☐ Dead
- b. What is the approximate date of proposed take? 9/25/2018
- c. What is the date you took the animal? — 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]:
- Spekboomberg Farm  
77 Frere Street  
Cradock, South Africa 5880
5. ENTER the name and address of the landowner on whose property the bontebok was or will be taken:

Owners name: Mr. Irvin Tam  
Farm Name: Spekboomberg  
District: —  
Address: 77 Frere Street  
City: Cradock  
State/Province: Eastern Cape  
Country, Postal Code: South Africa 5880

Please be aware that the bontebok is listed in Appendix II of CITES. As such, you must obtain a CITES export permit from South Africa. If you are not exporting the trophy from South Africa directly to the United States, you will need to obtain a CITES Re-export certificate from the re-exporting country.

6. Attach a signed statement from the landowner giving you permission to cull a bontebok from their captive herd.
7. If available, provide a copy of the landowner's Certification of Registration for the bontebok herd. (Note: this is not a copy of the export permit or certificate issued by a South African province.) In order to meet the criteria for a permit under the Endangered Species Act, the bontebok must be culled from a ranch that has been certified by the Government of South Africa under their bontebok program. If the ranch is not registered, we may be unable to issue an import permit.

8. **Complete name and address** of overseas person or business shipping the trophy to you (this name will appear on the face of the permit).

Name: Irvin Tam  
Business Name: TAM SAFARIS  
Address: 77 Freere St  
Address: \_\_\_\_\_  
City: Cradock  
State/Province: Eastern Cape  
Country, Postal Code: South Africa 5880

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. 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).

Taxidermist/Broker's signature: \_\_\_\_\_ Date: \_\_\_\_\_

10. 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).

Applicant's signature:  Date: 04/16/2018

*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.*

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).

# ***Certificate of Registration***

## ***BONTEBOK HERD***



***It is hereby certified that the  
Bontebok herd on  
the property Spekboomberg, of  
Mr.Irvin Tam,  
in the Cradock district of the Eastern Cape,  
South Africa, is certified as pure on the  
13 May 2003***

***Presented to Mr.Irvin Tam  
Date: 13 May 2003***

  
***For, Chief Director: Environmental Affairs***

***Issued by: Department of Economic Affairs, Environment and Tourism  
Province of the Eastern Cape***





18 April 2018

**To Whom It May Concern:**

This letter serves to confirm that; Mr Aaron Kik; Passport # [REDACTED]

Address: [REDACTED]

Lowell, MI

[REDACTED]  
USA

Will be hunting in South Africa with Tam Safari's in the Eastern Cape during September 2018.

He is granted permission to hunt one excess Bontebok from the registered herd on the ranch, Spekboomberg, Cradock, South Africa.

Ranch: +27 488 811 053

Mobile: +27 826 526 610

Sincerely

Irvin Tam





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 <b>FRAZIER</b>	1 b. First Name <b>WALTER</b>	1 c. Middle Name/Initial <b>(b) (6)</b>	1 d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number	3 a. Alternate Telephone Number	4. E-mail address

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

1 a. Name of business, agency, Tribe, or institution		1 b. Doing business at (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>(b) (6)</b>				
1 b. City <b>Scott Depot</b>	1 c. State <b>WV</b>	1 d. Zip code/Postal code <b>(b) (6)</b>	1 e. County/Province	1 f. Country <b>USA</b>
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)	
<b>Walter Frazier</b> <b>(b) (6)</b> <b>2/27/2018</b>	
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)?

WALTER FRAZIER, (b) (6)

(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.

*Loxodonta* African elephant

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:

Zimbabwe, South 18°59.683 East 027°34.410

North west of Bulawayo, Zimbabwe

b. Date wildlife was hunted: (Safari dates:

August 18, 2017 through August 31, 2017)

Harvest Date: August 26, 2017

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

Brian Van Blerk /  
Brian Van Blerk 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]:

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).

N/A

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, 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?

- 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?

\$25,000.00 + \$4500.00 tips to local & governmental employees. I was accompanied by 2 (two) Governmental officials during my entire safari. Part of my fees paid for these 2 employees. I met and witnessed 2 separate anti poaching teams (4 & 5 persons) in action during my safari. I am sure that I contributed greatly to the funding of these persons.

- 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?

When elephants are poached, none of the meat is edible! My wife and I witnessed meat (all of my elephant) being hung out to dry in two separate villages. Local people from many areas came to receive meat from the elephant! None was wasted!

I feel very confident that the money spent by myself and my wife and my son contributed greatly to the survival of the elephants.



**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: \_\_\_\_\_

Walter (b) (6) (b) (6) Frazier Date: 2/27/2018

*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).



# 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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April 23, 2018

U.S. Fish and Wildlife Service  
Division of Management Authority (DMA)  
Branch of Permits, MS: 1A  
5275 Leesburg Pike  
Falls Church, VA 22041

RCVD MAY 1 2018

Re: Application for Permit to Import a Sport-Hunted Elephant Trophy

Dear Acting Chief:

Enclosed please find one application for a permit to import a sport-hunted elephant trophy to be hunted in Namibia. The applicant is hunting with Thormahlen & Cochran Safaris. We will shortly provide a report from this operator demonstrating the benefits of elephant hunting in the concession. Among other things, the report will show that the proceeds of the hunt are shared with nearby rural communities and used to fund essential anti-poaching and management activities. Please consider this information and other information submitted by Conservation Force and Namibia's Ministry of Environment and Tourism 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

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](mailto:jjj@conservationforce.org)  
[www.conservationforce.org](http://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 ELPHANT 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.

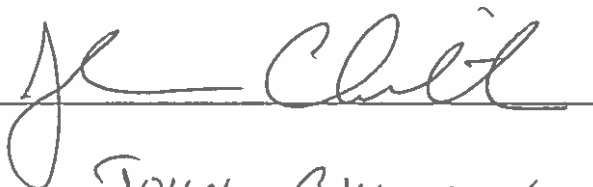
I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

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: \_\_\_\_\_

Date: \_\_\_\_\_

  
JOHN CHILTON  
3/30/2018



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

**Federal Fish and Wildlife Permit Application Form**

RCVD MAY 1 2018

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

**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.

<b>A. Complete if applying as an individual</b>			
1.a. Last name Chilton	1.b. First name John	1.c. Middle name or initial (b) (6)	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>B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution</b>			
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

<b>C. All applicants complete address information</b>					
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 Dallas	1.c. State Texas	1.d. Zip code/Postal code (b) (6)	1.e. County/Province	1.f. Country USA	
2.a. Mailing Address (include if different than physical address, include name of contact person if applicable)					
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country	

<b>D. All applicants MUST complete</b>	
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 – <b>attach documentation of fee exempt status as outlined in instructions.</b> (50 CFR 13.11(d))	
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in <i>Title 50, Part 13 of the Code of Federal Regulations</i> and the other <i>applicable parts in subchapter B of Chapter I of Title 50</i> , 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)	04/10/2018 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:** 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)?

Attorneys for Conservation Force, 504-837-1233, [cf@conservationforce.org](mailto: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.

*Loxodonta africana* (African elephant)

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:

Namibia -- Mangetti National Park in the Kavango West Region of Namibia

b. Date wildlife was hunted: August 15, 2017

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

Thormahlen & Cochran

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]:

The Yellow Shark Holdings, Windmill Park Unit 7, Dante Street, Prosperita, Windhoek, 

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:

The Yellow Shark Holdings, Windmill Park Unit 7,

DANTS STREET, PROSPERINA, WINDHOEK

NAMIBIA

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: 4/19/18

*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).





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: 1A  
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 <b>POWELL</b>	1.b. First Name <b>W</b>	1.c. Middle Name/Initial <b>(b) (6)</b>	1.d. Suffix
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2. Date of birth (month/day/year) <b>(b) (6)</b>	3. Sex <b>(b) (6)</b>
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## 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>(b) (6)</b>				
1.b. City	1.c. State <b>FLORIDA</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. Country <b>U.S.A.</b>	
2.a. Mailing address (include if different than physical address; include name of company or institution 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)	
<b>W. Powell</b>	<b>04/25/2018</b>

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.

N/A

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

W. (b) (6) POWELL

(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.

AFRICAN 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:

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:

NORTH WESTERN REPUBLIC OF SOUTH AFRICA -  
LIMPOPO PROVINCE - NORTH OF ALLDAYS - NEAR PHENORIE

b. Date wildlife was hunted:

20 JUNE 2017

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

ES - SAZARIS, MAPUNGBWE OUTFITTERS

- 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]:

PLOT 114, BASHEWA, PRETORIA, 0056, REP. OF 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: UNIVERSAL TROPHY SERVICES

Business Name: PLT 114

Address: BASHEWA

City: PRETORIA

State/Province: REPUBLIC OF 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?

OVER POPULATED WITH ELEPHANTS, LOSING HABITAT, DAMAGE CONTROL PERMITS IN THIS AREA

- 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?

THE LAND OWNER CONTINUES TO RE PLANT TO REPAIR DAMAGE FOREST AND CROPS, LOCAL COMMUNITY PEOPLE ARE EMPLOYED TO ASSIST

- 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

ALL ABOVE WORK WITH NATURE'S CONSERVATION TO STUDY WILDLIFE FOR FUTURE, INVOLVES DRIVING, TRACKING COLLARS, PROTECTING FROM POACHERS

**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: 25 APR 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)

RCVD MAY 11 2018

1 MAY 18

HI:

IM EMBARRASSED TO SAY "I FORGOT TO  
ENCLOSE THE PERMIT REQUEST FEE", BUT  
I DID FORGET. PLEASE POST THIS \$100 TO "88193C."

W. DAVID ROWELL

THANK YOU,

(b) (6)

W. David Rowell



**Timothy (b) (6) Decker**  
(b) (6)  
**Apple Valley, California (b) (6)**  
(b) (6)

April 26, 2018

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

Dear Sir or Madam,

Attached is my application to import the trophies from the African elephant I took in Namibia on September 19, 2015 while hunting with Jamy Traut Hunting Safaris.

With the application I have included the CITES export and import permits from Namibia and South Africa for the artifacts associated with the elephant. Also included is the invoice from Highveld Taxidermy, the taxidermist that is preparing the trophies for me. The highlighted items on the invoice are the things that have been made from the tusks, hide, feet, and tail of the elephant.

If you require any additional information, you can reach me at:

Timothy (b) (6) Decker

(b) (6)  
Apple Valley, CA (b) (6)

My email address is (b) (6)

My telephone numbers are:

(b) (6)

Thank you for your attention.

Sincerely,



Timothy (b) (6) Decker  
(b) (6)





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 <b>Decker</b>	1.b. First Name <b>Timothy</b>	1.c. Middle Name/Initial <b>(b) (6)</b>	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address

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

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

**Section C: All applicants complete address information**

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes) <b>(b) (6)</b>				
1.b. City <b>Apple Valley</b>	1.c. State <b>California</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>
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)  <div style="display: flex; justify-content: space-between;"> <div> <b>(b) (6)</b>    <b>Timothy Decker</b> </div> <div> <b>04/24/2018</b> </div> </div>	
<b>Please continue to next page</b>	

**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)?

Timothy (b) Decker

(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.  
*loxodonta africana* African bush elephant
- b. Sex (if known). Male (Bull)

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:  
S 17° 50' 08.1"  
E 023° 21' 08.4  
Mayuni Conservancy  
Nearest city: Kongola, Namibia
- b. Date wildlife was hunted:  
09/19/2015

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

Outfitter/Safari Company: Jamy Traut Hunting Safaris  
Professional Hunter: Karel Grunschloss

- 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]:

Highveld Taxidermists (Pty) Ltd.  
354 Vlakplaats  
Hennopsriver  
Erasmia 0023  
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: Highveld Taxidermists (Pty) Ltd.

Address: 354 Vlakplaats

City: Hennopsriver

State/Province: Erasmia 0023

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?

- 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?

I paid \$20,000.00 in trophy fees. That money was used to pay the game rangers' salaries, thereby contributing elephant conservation through the rangers' anti-poaching efforts; a portion of the fees went to the Mayuni Conservancy and into the local community where they provided funds for infrastructure development and education; and some of the fees went to three villages who provided manpower to recover the elephant. The meat from the elephant was divided between three villages and fed more than 3,000 people.

- 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

Jamy Traut Hunting Safaris has established boreholes (wells) throughout the concessions, and he maintains these wells throughout the year to ensure that elephants and other wildlife have a reliable source of water. Jamy Traut's professional hunters aid the game rangers to suppress poaching of elephants and other species.

**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: Timothy (b) (6) Decker Date: 04/24/2018

*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 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).



CONVENTION ON  
INTERNATIONAL TRADE IN  
ENDANGERED SPECIES OF  
WILD FAUNA AND FLORA

PERMIT / CERTIFICATE No.

☒ EXPORT

☐ RE-EXPORT

☐ IMPORT

☐ OTHER:

Date of issue / Certificate No: 0050579

0050579

Original

2. Valid until

16/03/2017

3. Importer (name and address)

Timothy (b) (6) Decker  
Hohveldt Taxidermv  
Farm 354, Viakolaats  
Hennopsriver 0023

4. Exporter / Re-exporter ( name, address and country)

K. Grunschloss  
P. O. BOX 11808  
Windhoek

*[Signature]*  
Signature of the applicant

3a. Country of import

South Africa

Namibia

5. Special conditions

Tusks no's: NA 15 0081 24 20 & NA 15 0082 22 85

6. Name, address, national seal/ stamp and country of Management Authority



MINISTRY OF ENVIROMENT AND  
TOURISM

Directorate Scientific Services  
Private Bag 13306  
Windhoek  
NAMIBIA

5a. Purpose of the transaction (see reverse)

H

5b. Security stamp No.

1503845

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. *Loxodonta africana*  
African elephant

9. 2x Tusks

10. II W

11. 2 item

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 \*\*\*

B 7./8. *Loxodonta africana*  
African elephant

9. 2x ears, 4x feet, 13x skin  
panels & trunk

10. II W

11. 20 item

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 \*\*\*

C 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 \*\*\*

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 IS ISSUED BY:

J. Shapi

Windhoek

16/09/2016

Place

Date



14. EXPORT ENDORSEMENT.

15. Bill of Lading / Air Waybill Number

083 3408 1541

2017-02-23

Block	Quantity
A	2
B	20
C	
D	

Hair

Date

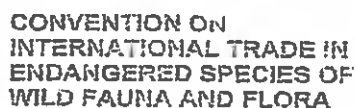
Signature

Official stamp and title

Original

Namprint: 2308







005:25:53 11:50:00

Original

2. Valid until

1525254

<b>3. Importer (name and address)</b> Timothy (b) (6) Decker Midwaydelt Taxidermy Farm 864 Vlakplaate Herengraver 0023		<b>4. Exporter / Re-exporter (name, address and country)</b> F. Grunschloss P.O. Box 11203 Windhoek																										
<b>3a. Country of import</b> South Africa		<b>6. Name, address, national seal/ stamp and country of Management Authority</b> <div style="text-align: center;">   <b>MINISTRY OF ENVIRONMENT AND TOURISM</b>          Directorate: Scientific Services          Private Bag 13306          Windhoek          NAMIBIA       </div>																										
<b>5. Special conditions</b> <p style="font-size: small;">All imports and exports remain subject to veterinary regulations.          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.</p>		<b>8. Name, address, national seal/ stamp and country of Management Authority</b> <div style="text-align: center;">   <b>MINISTRY OF ENVIRONMENT AND TOURISM</b>          Directorate: Scientific Services          Private Bag 13306          Windhoek          NAMIBIA       </div>																										
<b>3a. Purpose of the transaction (see reverse)</b> H		<b>5b. Security stamp No.</b> 505539																										
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\* 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

<b>13. THIS PERMIT IS ISSUED BY:</b> J. Shapi		1 APR 2017
Windhoek	13/04/2017	Windhoek
Place	Date	Place

**14. EXPORT ENDORSEMENT:**

15. Bill of Lading / Air Waybill Number 083-3614 8781	12 APR 2017
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Block A B C D	Quantity 1    	Port of Export / Re-export Harare	Date 12/04/2017
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Original

**Namorint: 7308**

PERMIT / CERTIFICATE 166149




CONVENTION ON  
INTERNATIONAL TRADE IN  
ENDANGERED SPECIES OF  
WILD FAUNA AND FLORA

☐ EXPORT  
☐ RE-EXPORT  
☒ IMPORT  
☐ OTHER

EXPORT  
RE-EXPORT  
IMPORT  
OTHER

ORIGINAL

2. Valid until 19/04/2017

3. Importer (name and address) Timothy Decker C/O Highveld Taxidermists 354 Vlakplaat, Hennopsriver 0023 Ekurhuleni Pretoria		4. Exporter / Re-exporter (name, address and country) K. Grunschloss Windhoek NAMIBIA	
3a. Country of Import RSA		6. Name, address, national seal / stamp and country of Management Authority Department of Environmental Affairs Private Bag X447 PRETORIA 0001 SOUTH AFRICA	
5. Special conditions This is valid without attached permit conditions (page 2 of 2) NA 0050579 dd 16/09/2016			
<p>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. Permit / certificate valid for one consignment only.</p>			
5a. Purpose of the transaction (see reverse) H		5b. Security stamp No. 1357070	

7.8 SCIENTIFIC NAME (genus and species) AND COMMON NAME OF ANIMAL OR PLANT	8. Description of specimens, including identifying marks or numbers (eye/ear) if live	10. Appendix No. and source (see reverse)	11. Quantity (including unit)	11a. Total exported / quota
A. <i>Loxodonta africana</i> African elephant NA 15 0081 24.20 NA 15 0082 22.85	9. Tusks	10. IIW	2 (Two)	11a.
B. <i>Loxodonta africana</i> African elephant	9. Ears	10. IIW	2 (Two)	11a.
C. <i>Loxodonta africana</i> African elephant	9. Feet	10. IIW	4 (Four)	11a.
D. <i>Loxodonta africana</i> African elephant	9. Trunk	10. IIW	1 (One)	11a.

\* Country in which the specimens were taken from the wild, bred in captivity or artificially propagated for commercial purposes  
\* 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: P. Mthembu	20 OCT 2016	1357070
Pretoria	20/10/2016	
Place	Date	

14. EXPORT ENDORSEMENT	15. Bill of Lading/Air Waybill Number 83 3408 1541	<p>Cancelled by an Environmental Management Inspector Signature: [Signature] Date: 13/03/2017</p>									
<table border="1"> <thead> <tr> <th>Block</th> <th>Quantity</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>02 (Two)</td> </tr> <tr> <td>B</td> <td>02 (Two)</td> </tr> <tr> <td>C</td> <td>04 (Four)</td> </tr> <tr> <td>D</td> <td>01 (One)</td> </tr> </tbody> </table>	Block		Quantity	A	02 (Two)	B	02 (Two)	C	04 (Four)	D	01 (One)
Block	Quantity										
A	02 (Two)										
B	02 (Two)										
C	04 (Four)										
D	01 (One)										

PERMIT / CERTIFICATE 166148



CONVENTION ON  
INTERNATIONAL TRADE IN  
ENDANGERED SPECIES OF  
WILD FAUNA AND FLORA

☐ EXPORT  
☐ RE-EXPORT  
☒ IMPORT  
☐ OTHER

ORIGINAL

2. Valid until 18/04/2017

3. Importer (name and address) Timothy Decker  
354 Vlakplaats Hennopsteyn  
Glasnia 0023 Pretoria

4. Exporter / Re-exporter (name, address and country)  
K. Grunschloss  
Windhoek  
NAMIBIA

3a. Country of Import RSA

5. Special conditions NA 0050579 dd 16/09/16  
Invalid without attached permit  
Conditions (page 2 of 2) Integrated  
permit doc attached

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)

5b. Security stamp No.

H

1357069

7. 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 *Loxodonta africana*  
African elephant

9 Skin panels

10 11w

11 13 (Thirteen)

A

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 \*\*\*

B

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 \*\*\*

C

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 \*\*\*

D

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 P. Mthembu

19 OCT 2016

Pretoria

Place

19/10/2016

Date

DIRECTORATE OF CONSERVATION  
PERMITS OFFICE  
P.O. BOX 6769, JOHANNESBURG

14. EXPORT ENDORSEMENT:

15. Bill of Lading/Air Waybill Number:

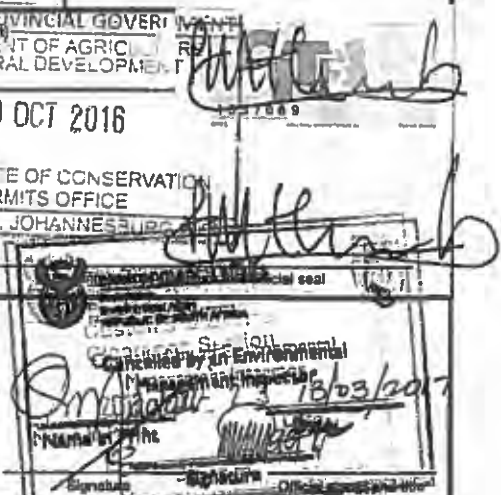
Block	Quantity
A	13 (Thirteen)
B	
C	
D	

83 3408 1541

Port of Export

13/03/2017  
28/07

Date







CONVENTION ON  
INTERNATIONAL TRADE IN  
ENDANGERED SPECIES OF  
WILD FAUNA AND FLORA

PERMIT / CERTIFICATE No.

197031

ORIGINAL

☐ EXPORT  
☐ RE-EXPORT  
☒ IMPORT  
☐ OTHER

2. Valid until 12/12/2017

3. Importer (name and address) Mr. Timothy Decker 10 Highveld Tacticians 354 Vlakplaat Hennapstreek Glasnia 2023 PRETORIA RSA				4. Exporter / Re-exporter (name, address and country) K. G. G. Schloss Windhoek NAMIBIA			
3a. Country of Import RSA				5. Special conditions NA 0052553 del 18/04/2017 Invalid without attached permit conditions page 2 of 2 integrated permit doc attached <small>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. Permit / certificate valid for one consignment only.</small>			
5a. Purpose of the transaction (see reverse) H				5b. Security stamp No. 1364317			
7.8 SCIENTIFIC NAME (genus and species) AND COMMON NAME OF ANIMAL OR PLANT <i>Loxodonta africana</i> African elephant				9. Description of specimens, including identifying marks or numbers (ages/sex) if live Tail		10. Appendix No. and source (see reverse) 10	
11. Quantity (including unit) 1 (one)		11a. Total exported / quota		11b. No. of the operation ** or date of acquisition ***		11c. No. of the operation ** or date of acquisition ***	
12. Country of origin*		Permit No.		Date		12a. Country of last re-export	
12a. Country of last re-export		Certificate No.		Date		12b. No. of the operation ** or date of acquisition ***	
12. Country of origin*		Permit No.		Date		12a. Country of last re-export	
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12. Country of origin*		Permit No.		Date		12a. Country of last re-export	
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12. Country of origin*		Permit No.		Date		12a. Country of last re-export	
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12. Country of origin*		Permit No.		Date		12a. Country of last re-export	
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 for specimens of Appendix I species bred in captivity or artificially propagated for commercial purposes)  
\*\* 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: P. Mthembu  
Pretoria 13/06/2017

14. EXPORT ENDORSEMENT:  
Block Quantity  
A 1 (one)  
B  
C  
D

15. Bill of Lading/Air Waybill Number:  
083-3614 8781  
JNB  
Haw  
Port of Export  
31/10/2017  
12/10/17  
Date

16. CANCELLED BY AN ENVIRONMENTAL MANAGEMENT INSPECTOR  
Signature  
Date 31/10/2017  
Official stamp and title



Highveld Taxidermists,  
Farm 354, Vlakplaats, Hennopsriver,  
Centurion,  
Gauteng,  
South Africa -0023

Contact Name
Timothy Decker

**Sales Order:**  
**31453**

Phone +27 12 650-0400  
Fax +1 512-309-5373  
Email [monique@highveldtaxidermists.com](mailto:monique@highveldtaxidermists.com)  
Created 2017-08-10 04:40:05

Billing Address	Shipping Address
Mr.Decker " USA	Mr.Decker (b) (6) USA

Quantity	Item Name	Total
1	Elephant tusks = 1 set capped in brass on pedestal bases (pyramid shape with zebra skin inlays). tip of tusks about 5foot6 high. The tusks don't have even height - keep them that way, don't balance them out. Base wood Rhodesian Teak CAT:1	2,303
1	Replica Elephant set tusks - measurements to follow from Mrs. Decker - Contact outfitter for measurements on tusks. both tusks on one base with Elephant carving (dark carving to match the wood on the base) in middle that should not be taller than the tusks. - Wood for base PANGA PANGA CAT:1 (carving like the one in our pamphlet)	2,453
1	Elephant Trunk - tan for grey leather - price to be confirmed - CANCELLED DUE TO BACTERIAL DAMAGE 10/10/2017, CLIENT EMAILED.	0
2	Gunbag - made from Elephant leather (one like pic from client S11 style and scoped like on our website)	914
1	Elephant Ear - (Africa shape) tan for grey leather and send to artist for painting - price of leather to be confirmed - 21 sq ft tanned	208
1	Elephant ear painting - painting price to be paid directly to artist	0
1	Elephant Ear - tan for grey leather and use as inlay on table - price to be confirmed 30 sq ft tanned	222
1	Table with leather ear inlay - page 95 in coffee table book - use replica feet	995
2	Miscellaneous Items - 2 x Replica elephant feet to be used for table	942
1	Replica Elephant foot trashcan with brass trim	684
2	Elephant Feet (front feet) ice bucket with copper trim	1,302
1	Elephant Feet (back feet) made into floor standing lamp - back to back mount of feet on wooden base with tapered wooden shaft a	1,002
1	Elephant panels - tan for grey leather - quantity to be confirmed - once tanned we have to send measurements of panels so client can confirm 3 panels cancelled 30/10/2017 - 161 sq tanned	1,603

3	Elephant leather belt (from the damaged trunk leather) - double stitched, double layered belt. 1 1/2" wide with removable Elephant buckle. Must be able to fit gentleman with 34" waist 2 more added - 1 for 34" woman waist & 1 for 40" men's waist	375
1	Buffalo belt buckle - loose	25
6	Elephant leather wallets - 5 men's and 1 ladies wallet	690
2	Cartridge holder - fold over - (loops of one to fit .416 Rigby cases, loops of second one to fit .450 - .400 3" Nitro Express cartridges)	230
1	Elephant leather satchel - coffee table book page 74	395
1	Elephant Tail - As Wall Mount - mounted on wooden plaque	190
1	Packing & Crating - Shipping costs NOT included (payable to shipping agent) - final price to be included once all leather prices are confirmed	2,162.7
2	Cites permit - charged twice due to re-application for permits due to changes on order after permits were issued	162
1	Import permits	65
Items Total		16,922.7
Discount(0%)		0
Pre Tax Total		16,922.7
Tax(0)%		
Payments Received		-2,500
<b>GRAND TOTAL(\$)</b>		<b>14,422.7</b>

**Estimated Completion Date: 2018-03-28**

Professional Hunter: None

#### Terms and Conditions

You can read our terms and conditions by typing this link into your browser: <http://ow.ly/ziwv8>





MAY 9 2018

**PLEASE BE SURE TO MAIL THE COMPLETED CITES  
PERMIT TO:**

**D&L CHB, LLC  
1500 MIDWAY COURT, STE W201  
ELK GROVE VILLAGE, IL 60007  
CTC: LISA OR LAURA**



MAY 9 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 1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

Type of Activity

**IMPORT OF SPORT-HUNTED TROPHIES OF BONTEBOK  
TROPHIES FROM SOUTH AFRICA**

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 <b>Lortscher</b>	1.b First Name <b>John</b>	1.c Middle Name/Initial	1.d Suffix
2 Date of Birth (mm/dd/yyyy) [REDACTED]	3 Telephone Number <b>847-690-0690</b>	3.a Alternate Telephone Number	4. E-mail address <b>lisa@dlchb.com</b>

**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) [REDACTED]			
1.b City <b>Moneta</b>	1.c State <b>VA</b>	1.d Zip code/Postal code [REDACTED]	1.e County/Province <b>USA</b>
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) <b>[Signature]</b> <b>4/13/2018</b>

Please continue to next page

**IMPORT OF SPORT-HUNTED BONTEBOK TROPHIES from South Africa**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit to the address on page one.**

**Note 2:** 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:** The bontebok is listed as endangered under the Endangered Species Act. Applications for endangered species permits must be published in the Federal Register for a 30-day public comment period. Allow at least **90 days** for the application to be processed.

**Note 4:** This application can only be used if you have hunted/will be hunting in **South Africa**. If you have or will be hunting in a different country, please use form 3-200-20

**Note 5:** *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:
  - 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;
  - 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
  - The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

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 CNLS  
1500 Midway Court, Ste W201  
EIK Grove Village, IL 60007

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

Lisa Jomnik  
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.

N/A

4. How many Bontebok (*Damaliscus pygargus pygargus*) are you applying to import? Quantity: 1

a. At the time of the application, the specimen(s) is:

Alive

Dead

b. What is the approximate date of proposed take? \_\_\_\_\_

c. What is the date you took the animal? 8 / 2017

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]:

Karoo Taxidermy cc  
15 Van Der Bijl St / Ind Area  
Graaff-Reinet, South Africa 6280

5. ENTER the name and address of the landowner on whose property the bontebok was or will be taken:

Owners name:

Farm Name:

District:

Address:

City:

State/Province:

Country, Postal Code:

Gerhard Heyneke  
Ubukhulu Game Reserve  
P.O. Box 124  
Alexandria, Eastern Cape  
Grahamstown (Matana) South Africa

Please be aware that the bontebok is listed in Appendix II of CITES. As such, you must obtain a CITES export permit from South Africa. If you are not exporting the trophy from South Africa directly to the United States, you will need to obtain a CITES Re-export certificate from the re-exporting country.

6. Attach a signed statement from the landowner giving you permission to cull a bontebok from their captive herd.

See attached

7. If available, provide a copy of the landowner's Certification of Registration for the bontebok herd. (Note: this is not a copy of the export permit or certificate issued by a South African province.) In order to meet the criteria for a permit under the Endangered Species Act, the bontebok must be culled from a ranch that has been certified by the Government of South Africa under their bontebok program. If the ranch is not registered, we may be unable to issue an import permit.

See attached - permit,  
registration  
picture

8. **Complete name and address of overseas person or business shipping the trophy to you (this name will appear on the face of the permit).**

Name:  
Business Name:  
Address:  
Address:  
City:  
State/Province:  
Country, Postal Code:

Karoo Taxidermy  
15 Vander Bijl St  
Graaf-Reinet 6280  
Eastern Cape, South Africa

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. **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).

Taxidermist/Broker's signature: \_\_\_\_\_

*Gisa Jannil*

Date: \_\_\_\_\_

*4/13/2018*

10. **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).

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 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*



**CUSTOMS POWER OF ATTORNEY**

and

**Acknowledgement of Terms and Conditions of Service**Copyright 1995, National Customs Brokers and Forwarders Association of America, Inc.  
(Revised 07/04)

✓ appropriate box

- ☒ Individual  
☐ Partnership  
☐ Corporation  
☐ Sole Proprietorship  
☐ Limited Liability Company

SS#

KNOW ALL MEN BY THESE PRESENTS: That, ✓ JOHN [REDACTED] LORTSCHER doing  
 business as a ✓ INDIVIDUAL (Full name of individual, partnership, corporation, sole proprietorship, or limited liability company) (Identify)  
 under the laws of the State of ✓ VIRGINIA,  
 residing or having a principal place of business at ✓ [REDACTED] MONETA, VA [REDACTED] hereby constitutes and  
 appoints ✓ D&L CHB, LLC (Grantor'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 Terms and Conditions of Service governing all transactions between the Parties.  
 (Grantee's Name)

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 ✓ JOHN [REDACTED] LORTSCHER (Full name of company)  
 caused these presents to be sealed and signed: (Signature) ✓ [REDACTED] Lortcher  
 (Capacity) ✓ N/A Date: ✓ 6/6/17  
 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.





P.O.Box 124

Alexandria

6185

Fax: 086 562 8982

Cell: 0741035212

heynekeg@mweb.co.za

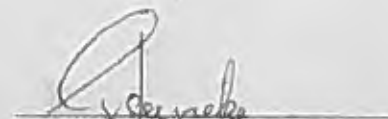
BTW/VAT: 4340227265

6 April 2018

**TO WHOM IT MAY CONCERN**

I Gerhard Heyneke, with ID number 640322 5128 081, hereby confirms that John [REDACTED] Lortscher with Passport number [REDACTED] had my permission as Landowner to hunt a Bontebok ram on my property known as Ubukhulu Game Ranch in Alexandria, Eastern Cape, South Africa during the period of 01 August 2017 to 07 August 2017.

Signed on this 6<sup>th</sup> day of April 2018



Gerhard Heyneke

# **Certificate of Registration**

## **BONTEBOK HERD**



**It is hereby certified that the  
Bontebok herd on  
the property Ubukhulu Game Reserve, of  
Mr. Gerhard Heyneke,  
in the Grahamstown district of the Eastern Cape,  
South Africa, is certified as pure on the  
15 October 2013**

**Presented to Mr. Gerhard Heyneke  
Date: 15 October 2013**

**For: Chief Director: Environmental Affairs**

**Issued by: Department of Economic Affairs, Environment and Tourism  
Province of the Eastern Cape**

## PROVINSIE VAN DIE OOS KAAP

## PROVINCE OF THE EASTERN CAPE

JAGLISENSIEHUNTING LICENCE

LISENSIEGELD

LICENCE FEE

R20.00

Ordonnansie op Natuur - en Omgewingsbewaring, 1994  
(Ordonnansie 19 van 1974) (artikel 27)

Nature and Environmental Conservation Ordinance 1974  
(Ordinance 19 of 1974) (section 27)

NIE OORDRAAGBAAR NIE

NOT TRANSFERABLE

Lisensie No.

Licence No.

A 66651

Behoudens die bepalinge van die Ordonnansie op Natuur en  
en Omgewingsbewaring, 1974 (Ordonnansie 19 van 1974),  
word 'n jaglisensie hierby uitgereik aan -

Subject to the provisions of the Nature and Environmental  
Conservation Ordinance 1974 (Ordinance 19 of 1974),  
a hunting licence is hereby issued to -

Voorletters en van  
initials and surname

J. [REDACTED] LORTSCHER

Woonadres

Residential address

MONETA, VIRGINIA  
USA

Ontvangs van voorgeskrywde lisensiegeld word hierby  
erken / Receipt of prescribed licence fee is hereby  
acknowledged

Datumstempel /  
Date stamp

01/08/2017

Lisensiehouer /  
licence holder

\* Direkteur van Natuur / \* Ontvanger van Inkomste / \* Gemagtigde Persoon /  
\* Director of Nature Conservation / \* Receiver of Revenue / \* Authorised person

## VOORWAARDES

1. Hierdie lisensie tree in werking slegs indien dit deur die houer daarvan onderteken is.
2. Hierdie lisensie is geldig vir twaalf maande vanaf die datum van uitreiking daarvan.

## CONDITIONS

1. This licence takes effect only if it is signed by the holder thereof.
2. This licence is valid for twelve months from the date of issue thereof.

\* SKRAP WAT NIE VAN TOEPASSING IS NIE

\* DELETE WHICHEVER IS NOT APPLICABLE



# GAME FARM HUNTING PERMIT

(Issued in terms of the provisions of the  
National Environmental Management  
Biodiversity Act 2004, Act 10 of 2004)

PERMIT NUMBER: GFH 03770 B

NAME OF ISSUING AUTHORITY	
NAME	
ADDRESS	
ADDRESS	
PROVINCE	

DETAILS OF HUNTER	
NAME	John LORTSCHER
SURNAME	LORTSCHER
POSTAL ADDRESS	
ADDRESS	
ADDRESS	
TOWN	MIONETA
POSTAL CODE	
PROVINCE	VIRGINIA USA
ID NO.	
PASSPORT NO.	
RESIDENTIAL ADDRESS	
NAME AND SURNAME	MARK HUDSON
CONTACT NUMBER	082 49 22 806
PERMIT NUMBER	72/2016 EC

DETAILS OF REGISTERED GAME FARM OWNER	
REGISTRATION CERTIFICATE NUMBER	GH CAE 29-16
NAME: LANDOWNER	Gertold Haynere
SURNAME: LANDOWNER	
REGISTERED FARM NAME AND NUMBER	Farm Ubukhulu
FARM SIZE (ha)	1001 ha
DISTRICT NAME	Makana
PROVINCE	Eastern Cape (Alexandria)

HUNTING METHOD	
HUNTING INSTRUMENT	RIFLE .308
HUNTING METHOD	WALK & STALK

DETAILS OF SPECIES INVOLVED			
COMMON NAME	SCIENTIFIC NAME	SEX (if known)	QUANTITY
Bontebok	Damaliscus pyrrhus	MALE	1 (ONE)

DETAILS OF RESTRICTED ACTIVITIES INVOLVED	

PERMIT VALIDATION				
DURATION OF THE HUNT	FROM:	01/08/2017	TO:	07/08/2017
PERIOD OF VALIDITY	FROM:	01/08/2017	TO:	07/08/2017
DATE ISSUED:		04/08/2017		
SIGNATURE OF GAME FARM OWNER:				
SIGNATURE OF HUNTER:				

NAME OF ISSUING OFFICER:		SIGNATURE OF ISSUING OFFICER:	
RECEIPT NUMBER			
STAMP OF ISSUING AUTHORITY:			



# SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

EC 26061

Duration of Hunt: Commenced: 01, 08, 2017 Terminated: 07, 08, 2017

✓ 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)	Mpumalanga (MPL)	Western Cape (CNC)	Eastern Cape (EC) <input checked="" type="checkbox"/>	Northern Cape (NC)
---------------------	-----------------	--------------	---------------------	-----------------	------------------	--------------------	---	--------------------

Post Permit to (Mark correct block with X)

**PROFESSIONAL HUNTER**

Name: MARK HUDSON

Business Address: 103 CALLEDON STREET, KENET

Code: 6280

I.D. No: 7609205179089

PH Permit No: 72/2016 EC

Date: 07/08/17 Signature: [Signature]

**CLIENT**

Name: JOHN KORTSCHER

Permanent Postal Address: MONETA VIRGINIA

Code: Country: USA

Passport No: [Redacted]

Tel/Fax: [Redacted]

Date: 8/1/2017 Signature: [Signature]

**HUNTING OUTFITTER**

Name: MARK HUDSON

Business Address: 103 CALLEDON STREET, KENET

Code: 6280

I.D. No: 7609205179089

Tel. No: 0824922506 Fax No: 0866024230

H.O. Permit No: 20/2016 EC

Date: 07/08/17 Signature: [Signature]

Farm Name Registration No.	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate / Licence No.	Date of Hunt		Species Killed / Wounded	Number Killed or Wounded	Sex		Part of Trophy to be Exported
				From	To			♂	♀	
WILLOW SLOPES	CANDELO	CHRIS NORTJE	E11/2016/GK	01/08		MOUNTAIN REEBUCK	1		✓	Skull, Cape
Game Farm	"	"	"			RED LEGHORN	1		✓	Skull, Cape, B-Skin
		"	"			SABLE	1		✓	Skull, Cape, B-Skin
Ubukhulu	MAKANA	G. HAYNEK	03770			BONTIE BOK	1	✓	no	Skull, Cape, B-Skin
SCARLETIEUX	PORT ALICE	G. SCARLETIEUX	GHCARDIS			BUSHBUCK	1		✓	Skull, Cape, B-Skin
WILLOW SLOPES	CANDELO	CHRIS NORTJE	E11/2016/GK	07/08		ELAND	1		✓	Skull, Cape

Copies: Client: Original

Hunting: 1st copy Forward to Nature Conservation authority where hunt took place

2nd copy Retain for a period of three years

Professional Hunter: Last copy Remain in book

Address to which trophies are to be sent: AFRICA ANYWAY SAFARI

Country: Trophy Export Date (Estimate):



CONVENTION ON  
INTERNATIONAL TRADE IN  
ENDANGERED SPECIES OF  
WILD FAUNA AND FLORA

PERMIT / CERTIFICATE No 216617

☒ EXPORT  
☐ RE-EXPORT  
☐ IMPORT  
☐ OTHER

ORIGINAL

2. Valid until 29.07.2018

3. Importer (name and address)

John [redacted] Lortscher  
[redacted]  
Monrovia, Virginia  
[redacted] USA

4. Exporter / Re-exporter (name, address and country)

Karoo Taxidermy  
15 Van der Bijl Street  
Graaff-Reinet  
6180  
Eastern Cape, RSA

3a. Country of Import United States of America

5. Special conditions Toks integrated permit  
G. Heyneke Registered Bontebok  
Ubuikhulu Breeder  
Game Reserve  
Grahamstown  
RSA

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. 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)

5b. Security stamp No.

H1370262

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

7.8 Damalisca P. Pygargus  
A Bontebok

9. Wall  
Pedestal

10. II (w)

11. One (1)

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 \*\*\*

7.8 Damalisca P. Pygargus  
B Bontebok

9. Back skin

10. II (w)

11. One (1)

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 \*\*\*

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 \*\*\*

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 \*\*\*

BIODIVERSITY & CONSERVATION  
DEPARTMENT OF ECONOMIC DEVELOPMENT  
ENVIRONMENTAL AFFAIRS AND TOURISM  
PRETORIA

2018-01-30

\* 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:

N. Bam

Bisho

Place

30.01.2018

Date

P/BAG X0054 INKROWA EYOUNG 20054  
P/BAG X0054 INKROWA EYOUNG 20054  
EYOUNG / EYOUNG  
P/BAG X0054 INKROWA EYOUNG 20054

1370262

Security stamp, signature and official seal

14. EXPORT ENDORSEMENT:

15. Bill of Lading/Air Waybill Number

Block	Quantity
A	
B	
C	
D	

Port of Export

Date

Signature

Official stamp and title

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. The permit shall:
  - 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 7.
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, Waybill/s and Bill of entry/s (SAD/ DA 550) must be presented for inspection. 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 and Waybill/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. Only A person authorized thereto by the Premier or Minister may 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 must 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.

Signature of Issuing Officer \_\_\_\_\_

Full Name

PDAG.X0054NGXGWA EYGEWA X0054  
 IDWAATSAX X0054  
 EKONOMIESE ONTWIKKELING  
 DIE PROVINSIE OOS-KAAP ELOSHO

**Signature of Recipient**

Date \_\_\_\_\_

Full Name

Conditions to this permit have been issued in terms of the applicable provisions of the NEMBA, the CITES and TOPS Regulations as well as the relevant provincial legislation (where applicable).





MAY 9 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 OF SOUTHERN  
AFRICAN LEOPARD AND NAMIBIAN SOUTHERN WHITE  
RHINOCEROS**

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 Boarskiwski	1.b. First Name Jaromir	1.c. Middle Name/initial	1.d. Suffix
(b) (6)	3. Telephone Number 847-279-9042	3.a. Alternate Telephone Number 847-690-0690	4. E-mail address lisa.j@dlchb.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. (b) (6)				
1.b. City Bloomington	1.c. State IL	1.d. Zip code/Postal code (b) (6)	1.f. Country USA	
2.a. Mailing address (include if different than physical address, include name of company)				
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 Jaromir 4/29/2018

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND  
NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** *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 4:** Certain hunting trophies, including leopard 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.

- Complete all questions on the application.
- Mark questions that are not applicable with "N/A".
- If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.
- 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)?

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.

*[Handwritten signature]*

4. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):
- a. Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20.
- b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia  
Quantity:      (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).

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 ANIMAL HAS ALREADY BEEN TAKEN, please enter the following:

- d. 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: **Manyara District  
Simanjiro Kitiangare Game Controlled Area,  
Arusha, Tanzania S. 4101768 E. 36470719**
- e. Date wildlife was hunted: **10/23/2017**
- f. Name of hunting outfitter, safari company, or professional hunter you will be hunting with: **Melami Hunt Safaris Ltd**

- g. 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]:

**Melami Hunting Safaris  
Box 13359  
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.

- a. 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:  
Address:  
City:  
State/Province:  
Country, Postal Code:

**Alexandria Logistics Ltd.  
Box 45156  
Dar Es, Salaam, Tanzania**

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. 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: **Sisa Lemink**

Date: **4/29/2018**

10. 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.*

11. 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

**CUSTOMS POWER OF ATTORNEY**  
and  
**Acknowledgement of Terms and Conditions of Service**

Copyright 1995, National Customs Brokers and Forwarders Association of America, Inc.  
(Revised 07/04)

✓ appropriate box:

- ☒ Individual  
☐ Partnership  
☐ Corporation  
☐ Sole Proprietorship  
☐ Limited Liability Company

SS# (b) (6)

KNOW ALL MEN BY THESE PRESENTS: That, ✓ JAROMIR BOGUSLAWSKI doing  
(Full name of individual, partnership, corporation, sole proprietorship, or limited liability company) (Identify)  
business as a ✓ INDIVIDUAL  
(Individual, partnership, corporation, sole proprietorship, or limited liability company) (Insert one) under the laws of the State of ILLINOIS,  
residing or having a principal place of business at (b) (6) BLOOMINGTON, IL (b) (6), hereby constitutes and  
appoints ✓ D & L CHB  
(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, unloading 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, unloading, 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 Terms and Conditions of Service governing all transactions between the Parties.  
(Grantee's Name)

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 ✓ JAROMIR BOGUSLAWSKI  
(Full name of company)  
caused these presents to be sealed and signed: (Signature) [Signature]  
(Capacity) ✓ N/A Date: 2/17/18  
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.





18554

MAIN PERMIT

IN.# 3110476

RETURN DATE:

Tuesday, November 28, 2017

APP: 2009333

## GAME HUNTING PERMIT

PERMIT NO.

2009334

Station	ARUSHA	Start Date	October 18, 2017	End Date	November 07, 2017	Package Type	21 DAYS	Extra Days:	0
This RESIDENT'S / VISITOR'S Permit is Granted to		JAROMIR (b) (6)		BOGUSL		of Address		Passport No. (b) (6)	
Who holds Weapon (Type)		RIFLES		Calibre .416/7MM/CZ/.338		Maker's No: 6668/9661/A323010/S6595152		C.A.P. No: -	
Licence No: B 007629		Dated 10-Oct-2017		Issued At		Weapon owner & Address		JAROMIR (b) (6) BOGUSLAWSKI	
and entitles him to hunt the below animals in the (Game area and blocks)									
owned by MELAMI HUNTING SAFARIS LTD									
PH MIANGA PARKERF, PH CAT. LICENSE No.									
Additional Blocks									

Signature of Holder

Signature of Issuing Officer & Official Stamp

SPECIES	No.	SAME SPECIES BOUGHT THIS YEAR
1 BABOON OLIVE	2	
2 BUFFALO AFRICAN CAPE	3	
3 BUSHBUCK HASAI	1	
4 BUSHPIG	1	
5 CARACAL	1	
6 DIKDIK KIRK'S	1	
7 DUiker COMMON	1	
8 ELAND PATERSON'S	1	
9 GAZELLE GRANT'S	2	
10 GENET BLOTCHED	1	
11 HARTBEEST COKE'S	2	
12 HYAENA SPOTTED	1	
13 IMPALA EAST AFRICAN	2	
14 JACKAL COMMON	1	
15 KLIPSPRINGER	1	
16 KUDU GREATER	1	
17 KUDU LESSER	1	
18 LEOPARD	1	
19 MONGOOSE BANNED	1	
20 ORYX FRINGED EARED	1	
21 OSTRICH	1	
22 PORCUPINE CRESTED	1	
23 RATEL (HONEY BADGER)	1	
24 REEDBUCK BOHOR	1	
25 SERVAL CAT	1	
26 STEINBUCK	1	
27 WARTHOG	1	
28 WILDCAT	1	
29 WILDEBEEST EASTERN WHITE BEARDED	2	
30 ZEBRA BURCHELL'S	2	

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 shotgun 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 .





PERMIT NO. 2009334

CLIENT NAME JAROMIR (b) (6) BOGUSLAWSKI

COMPANY MELAMI HUNTING SAFARIS LTD

PH NAME MIANGA PARKER,

PH LICENSE NO

REGISTER OF GAME KILLED (INCLUDES WOUNDED ANIMALS)

18554

SPECIES	No.	AREA WHERE HUNTED	WEAPON USED	DATE	TIME	SEX	GPS COORDINATES	LENGTH OF HORN/ANIMAL	OR WEIGHT	REMARKS
9. GAZELLE LYRANT	ONE	SIMANJIRO-KITIMANGARE G.C.A	338	19/10/2017	11:30 AM	M	E 36 44.1978 S 41 07 28	5	410,728	A 23-23 K
13. IMPALA	ONE	SIMANJIRO-KITIMANGARE G.C.A	338	20/10	5:05 PM	M	E 36 44.1978 S 41 07 28	13-23	23-23	
13. IMPALA	ONE	SIMANJIRO-KITIMANGARE G.C.A	338	22/10/2017	8:24 PM	M	S 41 07 28 E 36 44.1978	22-22	22-22	
18. LEOPARD	ONE	SIMANJIRO-KITIMANGARE G.C.A	338	23/10/2017	5:30 PM	M	S 41 07 28 E 36 44.1978	90		
30. ZEBRA	ONE	SIMANJIRO-KITIMANGARE G.C.A	338	24/10/2017	4:17 PM	M	S 41 07 28 E 36 44.1978			
22. PORCUPINE CRESTED	ONE	SIMANJIRO-KITIMANGARE G.C.A	338	26/10/2017	7:28 AM	M	S 41 07 28 E 36 44.1978			
11. COKE'S HARTBEEST	ONE	SIMANJIRO-KITIMANGARE G.C.A	338	27/10/2017	12:50 PM	M	S 41 07 28 E 36 44.1978	17-14		

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

SIGNATURE OF THE HUNTING CLIENT

SIGNATURE OF THE PROFESSIONAL HUNTER

SIGNATURE OF WILDLIFE OFFICER INCHARGE

07/10/2017



4-15-18

Dear Sir or Madam,

I shot an elephant in Tanzania in 2012. I had a CITES permit to import it, but it had a typo in it. I got a 2<sup>nd</sup> CITES from you to import it, but I never used it. It was good in 2014/15, however that was the time of the big poaching problems in Tanzania, and I was worried the tusks might get stolen in transit. Then, you closed imports. Now that imports are open again, I would like to bring home my 2012 tusks, please.

The only change to the application is my home address, because I moved a few years ago. You'll see my new address on this application.





I am also asking if you could please send my approved permit (if you approve it) to my work address, instead of my home address. I have included that work address in section C. This would help me out, since our UPS guy always leaves the mail on the porch and I have two puppies who've been chewing up everything the UPS guy leaves.

I have included the original CITES import permit.

I have also included the copy of ~~the current~~ a CITES permit to export from Tanzania. I sent it back to them to ask them to adjust my home address.

Thank you so very much!

Catherine Bondeau

(b) (6)

(b) (6)



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  
(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.

<b>A. Complete if applying as an individual</b>			
1.a. Last name <b>Rondeau</b>	1.b. First name <b>Catherine</b>	1.c. Middle name <b>(b) (6)</b>	1.d. Suffix
2. Address (Street address, Apartment #, Suite #, Box #, P.O. Boxes) <b>(b) (6)</b>		5. Affiliation/ Doing business as (see instructions) <b>(b) (6)</b>	
<b>B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution</b>			
1.a. Name of business, agency, Tribe, or institution <b>N/A</b>		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
<b>C. All applicants complete address information</b>			
1.a. Physical address (Street address, Apartment #, Suite #, Box #, P.O. Boxes) <b>(b) (6)</b>		1.d. Country <b>USA</b>	
1.b. City <b>Ann Arbor</b>	1.c. State <b>MI</b>	1.d. Country <b>USA</b>	
2.a. Mailing Address (include if different than physical address; include name of contact person if appropriate) <b>(b) (6)</b>			
2.b. City <b>Oakland</b>	2.c. State <b>MI</b>	2.d. Country <b>USA</b>	
<b>D. All applicants MUST complete</b>			
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 <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: <b>14US88593A/9</b>			
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. <b>Catherine Rondeau</b> Signature (In blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) <b>4-15-18</b> Date of signature (mm/dd/yyyy)			

**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. n/a

**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 n/a

**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. n/a

1. **Permit number.** Enter the permit number to be reissued/renewed/amend 14US88.593A/9
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.) n/a
5. **Sport-hunted trophies:** I hunted this elephant in the 2012 time frame. 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. n/a

→ I hunted this elephant in 2012. I could not use the first CITES permit to import it in 2012, because it had a typo on it. Then I got another CITES permit, which I did not use because I was worried the tusks would be stolen in transit. That was during the big poaching time. Then you closed imports. Now that imports are okay again, I would like my tusks from my 2012 hunt, please.



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:

Catherine Pondau

Date:

4-15-18

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:

Catherine Pondau

Date:

4-15-18

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/lc/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): ✓

n/a

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. ok

☐ 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.

It would be great if you could send the permit to my work address, because my dogs often eat things the UPS guy leaves on the porch. My work address is in section C.

Thanks!

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

Catherine Rondeau

(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.

n/a



CONVENTION ON  
INTERNATIONAL TRADE IN  
ENDANGERED SPECIES OF  
WILD FAUNA AND FLORA

PERMIT / CERTIFICATE

Nº 30945

Original

☒ EXPORT

☐ RE-EXPORT

☐ IMPORT

☐ OTHER :

2. Valid until

18/09/2018

3. Importer (name and address)

RONDEAU CATHERINE

(b) (6)

LEONARD, MI (b) (6)

3a. Country of import

U.S.A

5. Special conditions

- ① African Elephant harvest quota  $\frac{18}{20}$  (2012)  
② Replacement of CITES No 29077 issued on 25/09/2015

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 the transaction (see reverse)

H

5b. Security stamp N

153-121

4. Exporter / Re-exporter (name and address, country)

CERFLO FASANISI SAFARI CORPORATION LTD

P.O. BOX 21380

DAR ES SALAAM

TANZANIA

Signature of the applicant



6. Name, address, national seal/stamp and country of Management Authority

The Director of Wildlife  
Wildlife Division  
Ministry of Natural Resources  
and Tourism  
Mpingo House, 4th floor,  
40 Julius Nyerere Road,  
15 472 - DAR ES SALAAM  
TANZANIA

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. (LOXODONTA AFRICANA) 9. TUSK 10. LW 11. ONE (01) 11a.  $\frac{03}{100}$  (2018)  
AFRICAN ELEPHANT TZ-12-GUK-95-101C

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 \* \* \*

B 7.8. (LOXODONTA AFRICANA) 9. TUSK 10. LW 11. ONE (01) 11a.  $\frac{03}{100}$  (2018)  
AFRICAN ELEPHANT TZ-12-GUK-96-1815K

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 \* \* \*

C 7.8. (LOXODONTA AFRICANA) 9. SKULL 10. - 11. ONE (01) 11a.  $\frac{03}{100}$  (2018)  
AFRICAN ELEPHANT

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 \* \* \*

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:

Segelnie Tawind

DAR ES SALAAM

19.3.2018

Place

Date

Security stamp, signature and official seal

14. EXPORT ENDORSEMENT

15. Bill of Lading/Air Way-bill Number

Block	Quantity
A	
B	





# CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

## IMPORT PERMIT

Page 1 of 2

1. Original Permit/Certificate No.

14US88593A/9

2. Valid

09/16/2015

## 3. Permittee (name and address, country)

CATHERINE (b) (6) RONDEAU

(b) (6)  
LEONARD, M (b) (6)  
U.S.A. (b) (6)

## 4. Consignee (name and address, country)

GERARD PASANISI SARAH  
P.O. BOX 21880  
DAR ES SALAAM  
TANZANIAOriginal, Unused  
Permit Returned

## 5. Special Conditions

MUST COMPLY WITH ATTACHED GENERAL PERMIT CONDITIONS.

SPECIMEN(S) MAY NOT BE SOLD OR TRANSFERRED FOR ANY FINANCIAL  
REMUNERATION.

SEE ATTACHED PAGE 2 FOR ADDITIONAL CONDITIONS.

THIS RE-ISSUES AND REPLACES 12US88593A/9 ISSUED  
09/12/2013.*-May not be used for commercial purposes. For live animals, only valid  
if the transport conditions comply with the CITES Guidelines for  
Transport of Live Animals or, in the case of air transport, with IATA Live  
Animals Regulations.*

## 5a. Purpose of Transaction

H

## 6. U.S. Management Authority

U.S. FISH AND WILDLIFE SERVICE  
DIVISION OF MANAGEMENT AUTHORITY  
BRANCH OF PERMITS, MS 1A  
5275 LEESBURG PIKE  
FALLS CHURCH VA 22041-3803

09/17/2014

Issuing Date

U.S. CITES  
Management Authority

United States Management Authority

AUTHORITY: Endangered Species Act of 1973 (16 USC 1531 et. seq.)

## 7/8. Common Name and Scientific name (genus and species) of Animal or Plant

## 9. Description of Part or Derivative, including identifying marks or numbers (age/sex if live)

## 10. Appendix No. and Source

A. Common Name  
AFRICAN  
ELEPHANTScientific Name  
LOXODONTA  
AFRICANA9. IMPORT IMPORT PERSONAL SPORT HUNTED TROPHY  
(shipment may contain bones, hair, hide, tusks, teeth, or  
any taxidermied part. DOES NOT include worked,  
manufactured, or handicraft items such as curios, jewelry, or  
other utilitarian items.)

10. 1 W

11. Quantity (including units)  
1 NO12. Country of Origin  
TANZANIA

B. Common Name

LEOPARD  
Scientific Name  
PANTHERA  
PARDUS9. IMPORT PERSONAL SPORT HUNTED TROPHY  
(shipment may contain bones, claws, hide, skull, teeth, or  
any taxidermied part. DOES NOT include worked,  
manufactured, or handicraft items such as curios, jewelry, or  
other utilitarian items.)

10. 1 W

11. Quantity (including units)  
1 NO12. Country of Origin  
TANZANIA

C. Common Name

Scientific Name

9. [REDACTED]

10. [REDACTED]

11. Quantity (including units)

12. Country of Origin

D. Common Name

Scientific Name

9. [REDACTED]

10. [REDACTED]

11. Quantity (including units)

12. Country of Origin

E. Common Name

Scientific Name

9. [REDACTED]

10. [REDACTED]

11. Quantity (including units)

12. Country of Origin



14US88593A/9

**SPECIAL PERMIT CONDITIONS****for TANZANIAN LEOPARD AND ELEPHANT TROPHY IMPORT**

**MUST IMPORT THROUGH A DESIGNATED PORT AS LISTED IN CONDITION 10 OF GENERAL PERMIT CONDITIONS.**

**U.S. THREATENED SPECIES: TUSKS MUST BE MARKED AS PER [50 CFR 17.40(e)].  
IN ACCORDANCE WITH THE AFRICAN ELEPHANT CONSERVATION ACT, RAW IVORY, INCLUDING  
SPORT-HUNTED TROPHIES THAT ARE WHOLLY OR PARTIALLY IVORY, MAY NOT BE RE-EXPORTED  
FROM THE U.S. ELEPHANT MUST NOT HAVE BEEN TAKEN FROM ANY MORATORIUM AREA  
INCLUDING LONGIDO CONTROLLED HUNTING AREA (CHA).**

**U.S. THREATENED SPECIES [50 CFR 17.40 (f)].  
PERMITTEE MAY ONLY IMPORT TWO LEOPARD TROPHIES PER CALENDAR YEAR. EACH LEOPARD  
SKIN MUST HAVE A SELF-LOCKING TAG ATTACHED TO IT WHICH INDICATES THE STATE OF EXPORT,  
THE NUMBER OF THE SPECIMEN IN RELATION TO THE ANNUAL QUOTA, AND THE CALENDAR YEAR  
TO WHICH THE QUOTA APPLIES. THE EXPORT PERMIT (OR RE-EXPORT CERTIFICATE) MUST CONTAIN  
THE TAGGING INFORMATION AS OUTLINED ABOVE.**

**TROPHY MUST HAVE BEEN TAKEN DURING 2012 HUNTING SEASON.**

09/17/2014

Date

**U.S. CITES  
Management Authority**

  
Chief, Branch of Permits  
Division of Management Authority









Department of Interior  
U.S. Fish and Wildlife Service

RCVD MAY 11 2018

LB

# Federal Fish and Wildlife Permit Application Form

Type of Activity

U.S. Fish and Wildlife Service  
Division of Management Authority  
Branch of Permits, MS: IA  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-350-2104 or 703-350-2104

**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 <i>McGinnis</i>	1.b. First Name <i>Michael</i>	1.c. Middle Name <i>(b) (6)</i>
2. Date <i>(b) (6)</i>		

## 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) <i>(b) (6)</i>				
1.b. City <i>Lyndhurst</i>	1.c. State <i>VA</i>	1.d. Zip code/Postal code <i>(b) (6)</i>	1.e. County/Province <i>(b) (6)</i>	1.f. Country <i>USA</i>
2.a. Mailing address (include if different from physical address; include names of United States if applicable) <i>(b) (6)</i>				
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 <i>Title 50 Part 13 of the Code of Federal Regulations</i> and the other applicable parts in subchapter I 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. I understand that my false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.
Signature of applicant/Principal Officer <i>(b) (6)</i> No photocopied signatures Date of signature (mm/dd/yyyy) <i>4/30/2018</i>

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)?

*Michael McGinnis*

(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.

African Elephant

- 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:

Namibia, The Nuparo Conservancy in Zambezi Region  
of Namibia, Katimo Mulilo - nearest City

- b. Date wildlife was hunted:

Daggaboy Safaris, David Mullee on September 5,  
2017

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

Daggabay Safaris, David Mullen

- 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]:

Erongo Taxidermy, P.O. Box 102, Jan Smuts Str, 222  
Otavi, Namibia

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 is w/ Animal

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:

David Mullen

Business Name:

Daggabay Safaris

Address:

P.O. Box 3041

City:

WINDHOEK, Namibia

State/Province:

Country, Postal Code:

phone: 264 81 128 6531

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?

25,000 trophy fee, this money was give to the  
community where I hunted

- 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

Local folks are also employed in camp & staff  
All qil plans game shot went to local community

**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: 4/30/2018

*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).







Department of Interior  
U.S. Fish and Wildlife Service

RCVD MAY 11 2018

# Federal Fish and Wildlife Permit Application Form

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

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN  
AFRICAN LEOPARD AND NAMIBIAN SOUTHERN WHITE  
RHINOCEROS

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 <b>Simmons</b>	1. b. First Name <b>Jordan</b>	1. c. Middle Name <b>(b) (6)</b>	1. d. Suffix
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(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. (b) (6)			
1. b. City <b>Prineville</b>	1. c. State <b>OREgon</b>	1. d. Zip code/Postal code <b>(b) (6)</b>	1. e. Country <b>U.S. A.</b>
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. 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) <b>(b) (6)</b> <b>05/01/2018</b>

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND  
NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** *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 4:** Certain hunting trophies, including leopard 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.

- Complete all questions on the application.
- Mark questions that are not applicable with "N/A".
- If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.
- 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)?

Jordan Simmons

(b) (6)

(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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):
- a. Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20.
- b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia  
Quantity: \_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).
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, Bikita District, Save Valley Conservancy  
Masvingo Province, S 20, 40441, E 32, 11777, Mokore & Umkondo  
ranch
- b. Date wildlife is to be hunted:  
8/1/18 - 8/15/18  
MASVINGO
- c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:  
Mokore Safaris

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

d. 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:

e. Date wildlife was hunted:

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

g. 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*

8. Complete name and address of overseas person or business shipping the trophy to you.

*trophy consultants International, 4 Josiah chinemano Road Bulawayo Zimbabwe*

a. 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:

Address:

City:

State/Province:

Country, Postal Code:

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. 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: \_\_\_\_\_

10. 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: \_\_\_\_\_

5/1/18

*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.*

11. 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).





# CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

## IMPORT PERMIT

Page 1 of 1

1. Original Permit/Certificate No.  
**09US208979/9**
2. Valid until  
**03/18/2010**

## 3. Permittee (name and address, country)

JORDAN (b) SIMMONS

(b) (6)

PRINEVILLE, OR (b) (6)

U.S.A.

## 4. Consignee (name and address, country)

UTI

P.O. BOX 4158

HARARE

ZIMBABWE

**Original, Unused  
Permit Returned**

## 5. Special Conditions

MUST COMPLY WITH ATTACHED GENERAL PERMIT CONDITIONS.

MAY NOT BE USED FOR PRIMARILY COMMERCIAL PURPOSES.

U.S. THREATENED SPECIES [50 CFR 17.40(f)]

MUST IMPORT THROUGH A DESIGNATED PORT LISTED IN CONDITION 10. PERMITTEE CAN ONLY IMPORT TWO LEOPARD TROPHIES PER CALENDAR YEAR.

EACH LEOPARD SKIN MUST HAVE SELF-LOCKING TAG ATTACHED TO IT WHICH INDICATES THE STATE OF EXPORT, THE NUMBER OF THE SPECIMEN IN RELATION TO THE ANNUAL QUOTA, AND THE CALENDAR YEAR TO WHICH THE QUOTA APPLIES. THE EXPORT PERMIT (OR RE-EXPORT CERTIFICATE) MUST CONTAIN THE TAGGING INFORMATION AS OUTLINED ABOVE

TROPHY MUST HAVE BEEN TAKEN DURING 2009 HUNTING SEASON

## 5a. Purpose of Transaction

H

## 5b. Security No.

226953

## 6. U.S. Management Authority

DIVISION OF MANAGEMENT AUTHORITY  
U.S. FISH AND WILDLIFE SERVICE  
DEPARTMENT OF THE INTERIOR  
WASHINGTON, D.C. 20240  
UNITED STATES OF AMERICA

03/19/2009

Issuing Date

**U.S. CITES  
Management Authority**

United States Management Authority

AUTHORITY: Endangered Species Act of 1973 (16 USC 1531 et. seq.)

## 7/8. Common Name and Scientific name (genus and species) of Animal or Plant

## 9. Description of Part or Derivative, including identifying marks or numbers (age/sex if live)

## 10. Appendix No. and Source

## A. Common Name

LEOPARD

## Scientific Name

PANTHERA  
PARDUS

9. IMPORT PERSONAL SPORT HUNTED TROPHY  
(shipment may contain bones, claws, hide, skull, teeth, or  
any taxidermied part. DOES NOT include worked,  
manufactured, or handicraft items such as curios, jewelry, or  
other utilitarian items.)

10. 1 W

11. Quantity (including units)  
1

NO

12. Country of Origin  
ZIMBABWE

## B. Common Name

## Scientific Name

9.

10.

11. Quantity (including units)

12. Country of Origin

## C. Common Name

## Scientific Name

9.

10.

11. Quantity (including units)

12. Country of Origin

## D. Common Name

## Scientific Name

9.

10.

11. Quantity (including units)

12. Country of Origin

## E. Common Name

## Scientific Name

9.

10.

11. Quantity (including units)

12. Country of Origin

Specimen(s) will not be used for primarily commercial purposes. The recipient has suitable facilities to house and care for the specimen(s)







\$100

RCVD MAR 30 2018

Handwritten mark

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 OF BONTEBOK  
TROPHIES FROM SOUTH AFRICA**

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 <b>DITTO</b>	1.b. First Name <b>Roger</b>	1.c. Middle Name/Initial <b>(b) (6)</b>	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number	3.a. Alternate Telephone Number	4.

**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>(b) (6)</b>				
1.b. City <b>SNY HANISH</b>	1.c. State <b>WA</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>
2.a. Mailing address (include if different than physical address; include name of company, organization, or institution)				
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>Roger Ditto</b>

Please continue to next page

**IMPORT OF SPORT-HUNTED BONTBOK TROPHIES from South Africa**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** The bontebok is listed as endangered under the Endangered Species Act. Applications for endangered species permits must be published in the Federal Register for a 30-day public comment period. Allow at least 90 days for the application to be processed.

**Note 4:** This application can only be used if you have hunted/will be hunting in South Africa. If you have or will be hunting in a different country, please use form [3-200-20](#)

**Note 5:** 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:
  - 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;
  - 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
  - The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

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.

*Roger D. Tito*

(b) (6)

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

*Roger D. Tito,*

(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. How many Bontebok (*Damaliscus pygargus pygargus*) are you applying to import? Quantity: 1
- a. At the time of the application, the specimen(s) is:
- Alive ☐ Dead ☒
- b. What is the approximate date of proposed take? \_\_\_\_\_
- c. What is the date you took the animal? 23 JULY 2017
- 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]:  
TRUE RESOLUTION TAXIDERMY P.O. BOX 305  
ROCKWOLD PRIVATE GAME RESERVE GRAHAMSTOWN 6140  
SOUTH AFRICA
5. ENTER the name and address of the landowner on whose property the bontebok was or will be taken:
- Owners name: FRANK BAUKEN  
 Farm Name: THORN KLOOF  
 District: \_\_\_\_\_  
 Address: PO BOX 442  
 City: GRAHAMSTOWN 6140  
 State/Province: REPUBLIC OF SOUTH AFRICA  
 Country, Postal Code: \_\_\_\_\_
- Please be aware that the bontebok is listed in Appendix II of CITES. As such, you must obtain a CITES export permit from South Africa. If you are not exporting the trophy from South Africa directly to the United States, you will need to obtain a CITES Re-export certificate from the re-exporting country.
6. Attach a signed statement from the landowner giving you permission to cull a bontebok from their captive herd.
7. If available, provide a copy of the landowner's Certification of Registration for the bontebok herd. (Note: this is not a copy of the export permit or certificate issued by a South African province.) In order to meet the criteria for a permit under the Endangered Species Act, the bontebok must be culled from a ranch that has been certified by the Government of South Africa under their bontebok program. If the ranch is not registered, we may be unable to issue an import permit.

8. **Complete name and address of overseas person or business shipping the trophy to you (this name will appear on the face of the permit).**

Name: CHARL LE ROUX  
Business Name: TRUE REFLECTION TAXIDERMY  
Address: PO BOX 305  
City: GRAHAMSTOWN 6140  
State/Province: SOUTH AFRICA  
Country, Postal Code:

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. **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).

Taxidermist/Broker's signature: \_\_\_\_\_ Date: \_\_\_\_\_

10. **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).

Applicant's signature:  Date: 3-26-2018

*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 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).

FRANK BOWKER  
THORN KLOOF  
P.O. BOX 442,  
GRAHAMSTOWN  
6140  
REPUBLIC OF SOUTH AFRICA  
  
Tel +27829403779  
Email [info@bowkersafaris.co.za](mailto:info@bowkersafaris.co.za)

TO WHOM IT MAY CONCERN

I, Frank Bowker, of Thorn Kloof, Grahamstown hereby grant permission to  
Mr Roger Ditto of (b) (6) Snohomish, WA (b) (6) to  
shoot one Male bontebok out of my private herd. I remove old, surplus males in this manner.



F.W.M. BOWKER



VAN DIE KAAP DIE GOETE HOOP

TAK ALGEMENE PROVINSIALE DIENSTE  
HOOFDIREKTORAAT  
NATUUR- EN ONGEWINSBEWARING

PROVINSIALE GEDOU. DOHPSTHAAT  
PRIVAATSAK X9086, KAAPSTAD, 8000

TELEFAXS: (021) 23-0939, TELEGRAM: NATUUR  
TELEKS: 522368

Mr F Bowker  
Thornkloof  
P O Box 442  
GRAHAMSTOWN  
6140



PROVINCIAL ADMINISTRATION  
OF THE CAPE OF GOOD HOPE

GENERAL PROVINCIAL SERVICES BRANCH  
CHIEF DIRECTORATE  
NATURE AND ENVIRONMENTAL CONSERVATION

PROVINCIAL BUILDING, DORP STREET  
PRIVATE BAG X9086, CAPE TOWN, 8000

TELEFAX: (021) 23-0939, TELEGRAM: NATU  
TELEX: 522368

TELEPHONE  
TELEPHONE (021) 483-4098

ADMINISTRATIVE  
ENQUIRIES J F JOOSTE

VERWYSING  
REFERENCE AND 1/31

DATUM  
DATE 14 August 1990

Dear Mr Bowker

REGISTRATION OF BONTEBOK HERDS

Following the inspection done on 21 April 1989 on your farm Thornkloof it is my pleasure to inform you that your bontebok herd has been registered as a pure herd. Congratulations!

Please find enclosed your registration certificate. This certificate could be extremely valuable and you should do everything possible to retain the purity of your herd. In future export permits for sport-hunted bontebok trophies and permits to capture, sell and transport bontebok will only be issued in respect of registered herds.

Periodic reinspections of registered herds will be carried out in future and it is in your own interest to ensure that no contamination of your valuable herd occurs.

Once again, congratulations and thank you for your contribution to nature conservation.

Yours faithfully

1 DIRECTOR-GENERAL

D. DE LA HARPE  
Commissioner of the  
Provincial Administration  
Private Bag X9086, Cape Town, 8000



CONVENTION ON  
INTERNATIONAL TRADE IN  
ENDANGERED SPECIES OF  
WILD FAUNA AND FLORA

☒ EXPORT  
☐ RE-EXPORT  
☐ IMPORT  
☐ OTHER

EXPORT  
RE-EXPORT  
IMPORT  
OTHER

ORIGINAL

2. Valid until 27-05-2018

3. Importer (name and address) Renee Nitto (b) (6)				4. Exporter / Re-exporter (name, address and country) True Reflections Taxidermy Rosevale Farm Grahamstown 6139, RSA			
5. Special conditions Registered Bontebok F. Boulter Breeder. To be integrated Thornhill permit. Black 14-15 must Grahamstown completed prior to RSA. Export.				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. 1368892			
7.8 SCIENTIFIC NAME (genus and species) AND COMMON NAME OF ANIMAL OR PLANT				9. Description of speci- mens, including identify- ing marks or numbers (age/sex) if live		10. Appendix No. and source (see reverse)	
A 7.8 Damalisus P. Pygargus Bontebok				9. Backskin		10. 11 One (1)	
12. Country of origin*		Permit No.		Date		12a. Country of last re-export	
						12b. No. of the operation or date of acquisition ***	
B 7.8 Damalisus P. Pygargus Bontebok				9. Leg lamp (2 legs)		10. 11 One (1)	
12. Country of origin*		Permit No.		Date		12a. Country of last re-export	
						12b. No. of the operation or date of acquisition ***	
C 7.8				9.		10.	
12. Country of origin*		Permit No.		Date		12a. Country of last re-export	
						12b. No. of the operation or date of acquisition ***	
D 7.8				9.		10.	
12. Country of origin*		Permit No.		Date		12a. Country of last re-export	
						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				2017-11-78			
13. THIS PERMIT / CERTIFICATE IS ISSUED BY: N. Bam				2017-11-78			
Place Bhi'sho				Date 28-11-2017			
14. EXPORT ENDORSEMENT:				15. Bill of Lading/Air Waybill Number			
Block		Quantity					
A							
B							
C							
D							
Port of Export				Date		Signature	
						Official stamp and title	

# CONDITIONS FOR PERMIT NO. Is 20R596

Page 1 of 1

## 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 numbers and relevant expiry dates; and
  - g) Detailed packing list as per condition 7.
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 – 18:30):  
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, Waybill/s and Bill of entry/s (SAD/ DA 550) must be presented for inspection. 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 and Waybill/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. Only A person authorized thereto by the Premier or Minister may 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.

BIODIVERSITY & CONSERVATION DEPARTMENT OF ECONOMIC DEVELOPMENT	
Signature of Issuing Officer _____ Full Name	Signature of Recipient _____ Date _____ Full Name

Conditions to this permit have been issued in terms of the applicable provisions of the NEMBA, the CITES and TOPS Regulations as well as the relevant provincial legislation (where applicable).

**GAME FARM HUNTING PERMIT**

(Issued in terms of the provisions of the  
National Environmental Management  
Biodiversity Act 2004, Act 10 of 2004)

**PERMIT NUMBER: GFH 06088 B**

NAME OF ISSUING AUTHORITY	
NAME	DE DEAT
ADDRESS	PRIVATE BAG X 1000
ADDRESS	GRAHAMSTOWN
PROVINCE	E.C

DETAILS OF HUNTER		
NAME	ROGER DITTO	ID NO.
SURNAME	DITTO	PASSPORT NO. (b) (6)
POSTAL ADDRESS	(b) (6)	RESIDENTIAL ADDRESS
ADDRESS	(b) (6)	
ADDRESS		
TOWN	SNOCHOMISH	
POSTAL CODE	(b) (6)	
PROVINCE	WA	
PARTICULARS OF PROFESSIONAL HUNTER (in case of hunting client)	NAME AND SURNAME: CHARL LE ROUX	
	CONTACT NUMBER:	
	PERMIT NUMBER: 94/2015 EC	

DETAILS OF REGISTERED GAME FARM OWNER	
REGISTRATION CERTIFICATE NUMBER	30751
NAME: LANDOWNER	FRANK
SURNAME: LANDOWNER	ROUX
REGISTERED FARM NAME AND NUMBER	THORNKLOOF COM 144
FARM SIZE (ha)	3000
DISTRICT NAME	MAKANA
PROVINCE	EC

HUNTING METHOD	
HUNTING INSTRUMENT	RIFLE
HUNTING METHOD	WORK & TALK

DETAILS OF SPECIES INVOLVED			
SPECIES		SEX (if known)	QUANTITY
COMMON NAME	SCIENTIFIC NAME		
ROTEBOK	AMALUS PYGAEUS	MALE	1

DETAILS OF RESTRICTED ACTIVITIES INVOLVED	

PERMIT VALIDATION			
DURATION OF THE HUNT	FROM:	TO:	
PERIOD OF VALIDITY	FROM:	TO:	
DATE ISSUED:			
SIGNATURE OF GAME FARM OWNER:			
SIGNATURE OF HUNTER:			

NAME OF ISSUING OFFICER:	SIGNATURE OF ISSUING OFFICER:
RECEIPT NUMBER	
STAMP OF ISSUING AUTHORITY:	

N 6

PROVINSIE VAN DIE OOS KAAP

PROVINCE OF THE EASTERN CAPE

JAGLISENSIE

HUNTING LICENCE 44784

LISENSIEGELD

R20.00

LICENCE FEE

- en Omgewingsbewaring, 1994  
9 van 1974) (artikel 27)

Nature and Environmental Conservation Ordinance 1974  
(Ordinance 19 of 1974) (section 27)

**DRAGBAAR NIE**

**NOT TRANSFERABLE**

Lisensie No.

A

Licence No.

s van die Ordonnansie op Natuur en  
, 1974 (Ordonnansie 19 van 1974),  
y uitgereik aan -

Subject to the provisions of the Nature and Environmental  
Conservation Ordinance 1974 (Ordinance 19 of 1974),  
a hunting licence is hereby issued to -

(b) (6)

Roger Ditto

rewe lisensiegeld word hierby  
ribed licence fee is hereby

19/7/17

Datumstempel /  
Date stamp

*Roger Ditto*

Lisensiehouer /  
licence holder

Bewaring / \* Ontvanger van Inkomste / \* Gernagligde Persoon /  
reservation / \* Receiver of Revenue / \* Authorised person

**VOORWAARDES**

te in werking siegs indien di deur  
n onderteken is.  
geldig vit twaalf maande vanaf die  
ing daarvan.

VAN TOEPASSING IS NIE

**CONDITIONS**

1. This licence takes effect only if it is signed by the holder thereof.
2. This licence is valid for twelve months from the date of issue thereof.

\* DELETE WHICHEVER IS NOT APPLICABLE



# SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

EC 25310

Duration of Hunt:

Commenced: 19 / 7 / 17

Terminated: 26 / 7 / 17

✓ 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)

Mpumelanga  
(MP)

Western Cape  
(WC)

Eastern Cape  
(EC) ☒

Northern Cape  
(NC)

Post Permit to (Mark correct block with X)

PROFESSIONAL HUNTER	
Name:	Charles le Roux
Business Address:	Rockwood Game Farm Box 305 Carletonville
Code:	5140
I.D. No:	350328510184
PH Permit No:	HC 91/2015 EC
Date:	20/7/17
Signature:	

CLIENT	
Name:	[REDACTED]
Permit:	[REDACTED]
Code:	[REDACTED]
Pass:	[REDACTED]
Tel:	[REDACTED]
Date:	[REDACTED]

HUNTING OUTFITTER	
Name:	Charles le Roux
Business Address:	Rockwood Game Farm Box 305
Code:	5140
I.D. No:	350328510184
Tel. No:	
Fax No:	
H.O. Permit No:	HC 91/2015 EC
Date:	20/7/17
Signature:	

Farm Name Registration No.	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate / Licence No.	Date of Hunt		Species Killed / Wounded	Number Killed or Wounded	Sex		Part of Trophy to be Exported
				From	To			♂	♀	
Eliminate	Nkombe	J Ford	44784	19/7	7	Blue Ducker	1	✓		Full mount, skull, horns
Rockwood	Makana	C le Roux	44784			Lynx	1	✓		Full skin, skull, teeth
Thornkloof	Caradu	F. Bowker				Bontebok	1	✓		Half Cape Bk skin, skull, horns
Rockwood	Makana	C le Roux				White Schemuck	1	✓		Cape Bk skin, horns, skull
						Common Spottedbuck	1	✓		Cape Bk skin, horns, skull
						Common Kudu	1	✓		Cape Bk skin, horns, skull
						Ostrich	1	✓		Feet, wings, feet, skull
						Mountain Reedbuck	1	✓		Cape Bk skin, horns, Bk skin
						Zebra	1	✓		Cape Bk skin, feet
						Bushbuck	1	✓		Cape Bk skin, skull, horns

Copies: Client:

Original

Hunting:

1st copy Forward to Nature Conservation authority where hunt took place

2nd copy Retain for a period of three years

Professional Hunter:

Last copy Remain in book

Address to which trophies are to be sent:	
Code:	
Country:	Trophy Export Date (Estimate):

Copyright 543 726 2516



## ADDENDUM – ADDITIONAL INFORMATION



### STANDING PERMIT

(Issued in terms of the provisions of the National Environmental Management Biodiversity Act 2004, Act 10 of 2004)

PERMIT NUMBER: S 09743

NAME OF ISSUING AUTHORITY	
NAME	DEDEAT
ADDRESS	PRIVATE BAG X 1006
	GRAHAMSTOWN
PROVINCE	EASTERN CAPE

DETAIL OF SPECIES INVOLVED				
SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
BONTEBOK	<i>Damaliscus pygargus</i>	Mixed	77	N/A
BLACK WILDEBEEST	<i>Connochaetes gnou</i>	Mixed	20	N/A

ADDITIONAL CONDITIONS	
Any supplement to the stock of black wildebeest/bontebok on the property from an external source must be sourced from a property where a registered/permitted herd of black wildebeest already occur	
2. Any transport of black wildebeest/bontebok off the property requires an application for an ordinary permit in terms of NEMBA Act 10 of 2004, in addition to this, the transport of bontebok off the property must be accompanied by DNA test results;	
3. DEDEA cannot guarantee the purity of the black wildebeest herd for any selling/hunting or other purposes whatsoever;	
4. This permit is subject to a valid CAE in terms of the Nature and Environmental Conservation Ordinance 19 of 1974;	
5. The species listed in this standing permit in terms of NEMBA: Threatened and/or Species Regulations are adequately enclosed. The ownership of the species listed is therefore maintained in terms of the Game Theft Act 105 of 1991	

PERMIT VALIDATION			
PERIOD OF VALIDITY	FROM:	24/03/2015	TO: 24/03/2018
RECEIPT NUMBER	AE297284		

THANDIWE JACK  SIGNATURE OF ISSUING OFFICER	<div style="text-align: center;">                       DEPARTMENT OF ECONOMIC DEVELOPMENT TOURISM AND ENVIRONMENTAL AFFAIRS                 </div> SIGNATURE PERMIT HOLDER
DATE STAMP:	<div style="text-align: center;">                       Private Bag X1006 Grahamstown 6140                 </div>

# Certificate of Registration

It is hereby certified that the bontebok herd on the

property Thornkloof

of Mr. F. Bowker has been inspected

on 21 April 1989 and found to be pure.



CHIEF DIRECTOR



CHIEF DIRECTORATE: NATURE AND ENVIRONMENTAL CONSERVATION, C P A



# REGISTRATION CERTIFICATE

(Issued in terms of the provisions of the  
National Environmental Management:  
Biodiversity Act 2004, Act 10 of 2004)

CERTIFICATE NUMBER: 30853

## NAME OF ISSUING AUTHORITY

NAME

ADDRESS

ADDRESS

PROVINCE

PRIVAT

.706

DUN

1 STERN

PROVINCIAL DEPARTMENT

NATIONAL DEPARTMENT

CAPTIVE BREEDING OPERATIONS

COMMERCIAL EXHIBITION EXHIBITION

GAME FARMS

NURSERIES

SCIENTIFIC INSTITUTIONS

SANCTUARIES

REHABILITATION FACILITIES

WILDLIFE TRADERS

UNIQUE REGISTRATION NUMBER

811 450 7

00 CO&Q

## DETAILS OF CERTIFICATE HOLDER

NAME

neo S

ID NO. SO

5006

SURNAME

PASSPORT NO.

POSTAL ADDRESS

RESIDENTIAL ADDRESS

ADDRESS

O

2NKLOO FARM

. Box L

ADDRESS

ADDRESS

TOWN

GRAHAMSTCUO

RAHAMSTCUO

POSTAL  
CODE

6 C

6139

PROVINCE

ERN CAPE

asT era CAPE

## PROPERTY WHERE OPERATION WILL BE CONDUCTED

NAME AND SURNAME OF APPLICANT

DENHAM FRANCIS BOWLER

NAME AND SURNAME OF AGENT

PHYSICAL ADDRESS OF FACILITY

PHYSICAL ADDRESS OF FACILITY

THORNQVC) • FARM

DISTRICT NAME

cerTAMS

DEVELOPMENT

DEPARTMENT OF E&E  
AND ENVIRONMENT

DATE STAMP

PROVINCE REGISTERED		the farm)	2N CAPE
NAME AND NUMBER (in case of game			
PARTICULARS OF SPECIES			
SPECIES		SEX (if known)	QUANTITY
COMMON NAME	SCIENTIFIC NAME		
BONTERO	SCXO	MIXED	SIXTY - sm
	monochael nu		-THREE
			want
CERTIFICATE VALIDATION			
PERIOD OF VALIDITY	FROM:	0 - 2011	TO: 1g - 10 - 2014
RECEIPT NUMBER	RE272892		
CAPIN 81127 & uAC7			
SIGNATURE ISSUING OFFICER		SIGNATURE CERTIFICATE HOLDER	

12801

#### GENERAL CONDITIONS

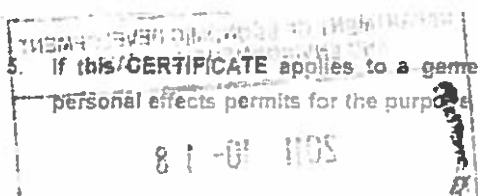
1. This CERTIFICATE not transferable.
2. Any unauthorised alteration to this CERTIFICATE shall render invalid.
3. This CERTIFICATE is subject to the provisions of any applicable law during the period of validity of the CERTIFICATE, in the area to which the CERTIFICATE applies.
4. This CERTIFICATE is vatic only within the province where it was issued.
5. The holder of this CERTIFICATE Shan, at the request of a person authorized in terms of applicable legislation so to demand, forthwith produce such CERTIFICATE to such person.
6. The holdei this CERTIFICATE shan the CERTIFICATE to the issuing authority mentioned on the CERTIFICATE within 7 (seven) working days after expiry of the CERTIFICATE.
7. This CERTIFICATE shall be invalid until such time that it is signed by the holdey thereof.
8. This CERTIFICATE shall be deemed invalid when it is lost or destroyed and no copy thereof shell be issued.
9. This CERTIFICATE may be withdrawn by an authorised person if the execution of any activity may be detrimental to the welfare of any animal or the sefety of any person, provided that the CERTIFICATE holder is given notice of such intention and be granted the opportunity to appeal to such withdrawal.

10. The prescribed fees paid for the issuing of this CERTIFICATE shall not be refunded.
11. If the holder of this CERTIFICATE contravenes or fails to comply with any condition or requirement to which this CERTIFICATE is subject, he or she shall be guilty of an offence.
12. This CERTIFICATE shall be subject to any applicable norms and standards in existence at the time of this CERTIFICATE.

#### SPECIAL CONDITIONS

1. The issuing authority shall determine the species and restricted activities for which this CERTIFICATE will apply.
2. This CERTIFICATE is subject to any additional conditions as may be determined by the issuing authority.
3. If this CERTIFICATE applies to a captive breeding operation, commercial exhibition facility or rehabilitation facility, the holder of this CERTIFICATE must:
  - a. Prevent hybridization and/or inbreeding;
  - b. Keep a studbook, where appropriate;
  - c. Provide information relating to paragraphs (a) and (b) mentioned above to the issuing authority mentioned on this certificate, within three months after the end of each calendar year.
4. If this CERTIFICATE applies to a game sanctuary, the holder of this CERTIFICATE may not allow any breeding in the sanctuary.
 

If the holder of this CERTIFICATE is also a game capturer, the holder of this CERTIFICATE does not qualify to be issued with a game capturing permit.



## ADDENDUM – ADDITIONAL INFORMATION




### STANDING PERMIT

(Issued in terms of the provisions of the National Environmental Management Biodiversity Act 2004, Act 10 of 2004)

PERMIT NUMBER: S 09743

NAME OF ISSUING AUTHORITY	
NAME	DEDEAT
ADDRESS	PRIVATE BAG X 1006 GRAHAMSTOWN
PROVINCE	EASTERN CAPE

DETAIL OF SPECIES INVOLVED				
SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
BONTEBOK	<i>Damaliscus pygargus</i>	Mixed	77	N/A
BLACK WILDEBEEST	<i>Connochaetes gnou</i>	Mixed	20	N/A
<p style="text-align: center;"><b>ADDITIONAL CONDITIONS</b></p> <p>Any supplement to the stock of black wildebeest/bontebok on the property from an external source must be sourced from a property where a registered/permitted herd of black wildebeest already occur</p> <p>2. Any transport of black wildebeest/bontebok off the property requires an application for an ordinary permit in terms of NEMBA Act 10 of 2004, in addition to this, the transport of bontebok off the property must be accompanied by DNA test results;</p> <p>3. DEDEA cannot guarantee the purity of the black wildebeest herd for any selling/hunting or other purposes whatsoever;</p> <p>4. This permit is subject to a valid CAE in terms of the Nature and Environmental Conservation Ordinance 19 of 1974;</p> <p>5. The species listed in this standing permit in terms of NEMBA: Threatened and/or Species Regulations are adequately enclosed. The ownership of the species listed is therefore maintained in terms of the Game Theft Act 105 of 1991</p>				
<b>PERMIT VALIDATION</b>				
PERIOD OF VALIDITY	FROM: 24/03/2015	TO: 24/03/2018		
RECEIPT NUMBER	AE297284			
THANDIWE JACK				
SIGNATURE OF ISSUING OFFICER		SIGNATURE PERMIT HOLDER		
DATE STAMP:		<div style="border: 1px solid black; padding: 5px; display: inline-block;"> 2015 -03- 24   Private Bag X1006  Grahamstown 6140 </div>		





14. EXPORT ENDORSEMENT:		15. Bill of Lading/Air Waybill Number:	
Block	Quantity		
C			
		Port of Export	Date
		Signature	Official stamp and title

V & R Printing Works (Pty) Ltd (012) 333 2462 (2621) PERMIT 1 CERTIFICATE N7 202596

CONDITIONS FOR PERMIT NO. 15 202596

Page 1 of 1

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:

- 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 7.
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/ 231 Fax: +27 (11) 390-1720
4. All relevant documentation, including original permit's (CITES permits must include original and coloured copy), Packing List's, Waybill's and Bill of entry's (SAD/ DA 550) must be presented for inspection. 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 and Waybill/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 <u>after endorsement</u> for Re-export permit applications. When applying for a Re-export permit, a copy of the <u>endorsed import permit</u> must be submitted to the Permit office with the application.	
9.	Only A person authorized thereto by the Premier or Minister may make any alteration on the permit.	
10.	Failure to comply with any of the p consignment's.	It in criminal proceedings. cancellation of the permit/s seizure of and
11.	The holder of the permit and / or irregularities and / or due to the co conditions. Permit holders or their delegated a inspection within a reasonable time	any legal costs; costs incurred for delays and / or storage n, and / or incorrect consignment's and / or failure to fees comply due to with permit ector/ official if an inspection is cancelled, or if they are to be 12. late for
	Signature of Issuing Officer	Signature of Recipient Date

Full Name

Full Name

Conditions to this permit have been issued in terms of the applicable provisions of the NEMBA, the CITES and TOPS Regulations as well as the relevant provincial legislation (where applicable).



## GAME FARM HUNTING PERMIT

NAME OF ISSUING OFFICER:		SIGNATURE OF ISSUING OFFICER:	
RECEIPT NUMBER			

STAMP OF ISSUING AUTHORITY:

DETAILS OF HUNTER			
NAME		ID NO.	
SURNAME		PASSPORT NO.	
POSTAL ADDRESS		RESIDENTIAL ADDRESS	
ADDRESS			
ADDRESS			
TOWN			
POSTAL CODE			
PROVINCE			
PARTICULARS OF PROFESSIONAL HUNTER (in case of hunting client)	NAME AND SURNAME:	ROUX	
	CONTACT NUMBER:		
	PERMIT NUMBER: q	115 EC	
DETAILS OF REGISTERED GAME FARM OWNER			
REGISTRATION CERTIFICATE NUMBER		30751	
NAME: LANDOWNER		FRANK	
SURNAME: LANDOWNER		ROUX	
REGISTERED FARM NAME AND NUMBER		THORNKLOFF	
FARM SIZE (ha)		3000	
DISTRICT NAME		MAKINA	
PROVINCE		DETAILS OF REGISTERED ACTIVITIES INVOLVED	
HUNTING METHOD			
HUNTING INSTRUMENT			
HUNTING METHOD	WALK	PERMIT VALIDATION	
DURATION OF THE HUNT	FROM:	DETAILS OF SPECIES INVOLVED	TO:
SPECIES		SEX	
COMMON NAME	SCIENTIFIC NAME	(if known)	TO
PERIOD OF VALIDITY			QUANTITY
RENTAL BAC	MAKINA	MALE	
SIGNATURE OF GAME FARM OWNER:	[Signature]		
SIGNATURE OF HUNTER:			

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act •10 of 2004)

PERMIT NUMBER: GFH 06088 B

NAME OF ISSUING AUTHORITY

NAME	DE DEAT
ADDRESS	PRIVATE BAC 1000







Rivera, Luis &lt;luis\_rivera@fws.gov&gt;

---

PRT# 84786c

1 message

---

Rivera, Luis <luis\_rivera@fws.gov>

Thu, Apr 12, 2018 at 11:12 AM

To: (b) (6)

Good morning.

I have been assigned your application to import a sport-hunted bontebok. Upon preliminary review of your application, we found that you did not include the date next to your signature on page 1, section D of the application. Please include the date and reply to this email with the scanned, completed page.

Please be aware that if the requested information is not received by this office within 45 days, 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.

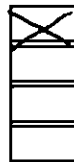
--

Sincerely,

Luis Rivera  
Legal Instrument Examiner  
USFWS/Division of Management Authority  
Branch of Permits, MS: IA  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
703-358-2604  
Fax: 703-358-2881  
Email: [Luis\\_Rivera@fws.gov](mailto:Luis_Rivera@fws.gov)



CONVENTION ON  
INTERNATIONAL TRADE IN  
ENDANGERED SPECIES OF  
WILD FAUNA AND FLORA



EXPORT  
RE-EXPORT  
IMPORT  
OTHER

ORIGINAL

2. Valid until 25-09-2018

3. Importer (name and address)

Boaer Nitto

(b) (6)

3a. Country of import U.S.A.

5. Special conditions Registered Bontebok Breeder  
F. Bowker Tops integrated permit  
Thornkloof Replacment of Cotes  
Grahamstown No. 28.11.2017 old  
RSA 28.11.2017 which will  
expire in France  
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. Permit / certificate valid for one consignment only.

5a. Purpose of the transaction (see reverse)

H 1372409

4. Exporter / Re-exporter (name, address and country)

True Reflections Taxidermy  
Rosedale Farm  
Grahamstown  
6139, RSA

5. Name, address, national seal / stamp and country of Management Authority

Department of Environmental Affairs  
Private Bag X447  
PRETORIA  
0001  
SOUTH AFRICA



7.8 SCIENTIFIC NAME (genus and species)  
AND COMMON NAME OF ANIMAL OR PLANT

A 7.8 Damalisus P. Pygargus  
Bontebok

9. Description of speci-  
mens, including identify-  
ing marks or numbers  
(age/sex) if live

Backskin

10. Appendix No.  
and source  
(see reverse)

II(w)

11. Quantity  
(including unit)

one (1)

11a. Total exported /  
quota

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 \*\*\*

B 7.8 Damalisus P. Pygerythrus  
Bontebok

9. Half mount  
wooden back  
mount

10. II(w)

11. One (1)

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 \*\*\*

C 7.8 Damalisus P. Pygargus  
Bontebok

9. leg lamp  
(2 legs)

10. II(w)

11. One (1)

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 \*\*\*

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:

AP. MZAMO

2018-03-26

Bhrisho

Place

26-03-2018

Date

PRONG X0954 INSKOWA PYDOWA X00.1

PKW

DIE

19

19

19

19

Security stamp, signature and official seal

14. EXPORT ENDORSEMENT:

15. Bill of Lading/Air Waybill Number:

Block	Quantity
A	
B	
C	
D	

Port of Export

Date


Signature

Official stamp and title


 CONVENTION ON  
INTERNATIONAL TRADE IN  
ENDANGERED SPECIES OF  
WILD FAUNA AND FLORA

<input checked="" type="checkbox"/>	EXPORT
<input type="checkbox"/>	RE-EXPORT
<input type="checkbox"/>	IMPORT
<input type="checkbox"/>	OTHER

2. Valid until 2018-03-26

3. Importer (name and address) (b) (6)		4. Exporter / Re-exporter (name, address and country) Private Bag X447 Pretoria 0001 South Africa	
3a. Country of import		4. Name, address, national seal / stamp and country of Management Authority Department of Environmental Affairs Private Bag X447 PRETORIA 0001 SOUTH AFRICA 	
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. Permit / certificate valid for one consignment only.			
5a. Purpose of the transaction (see reverse)	5b. Security stamp No.		

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			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 ***
B	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 ***
C	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 ***
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:  Place: _____ Date: _____ Security stamp, signature and official seal											
14. EXPORT ENDORSEMENT: <table border="1"> <thead> <tr> <th>Block</th> <th>Quantity</th> </tr> </thead> <tbody> <tr><td>A</td><td></td></tr> <tr><td>B</td><td></td></tr> <tr><td>C</td><td></td></tr> <tr><td>D</td><td></td></tr> </tbody> </table>		Block	Quantity	A		B		C		D	
Block	Quantity										
A											
B											
C											
D											
15. Bill of Lading/Air Waybill Number: Port of Export: _____ Date: _____ Signature: _____ Official stamp and title: _____											

**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 7.
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 – 16:30):  
 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, Waybill/s and Bill of entry/s (SAD/ DA 550) must be presented for inspection. 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 and Waybill/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. Only A person authorized thereto by the Premier or Minister may 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.



Signature of Issuing Officer  
A.B. MZANU  
 Full Name

Signature of Recipient \_\_\_\_\_ Date \_\_\_\_\_  
 Full Name

Conditions to this permit have been issued in terms of the applicable provisions of the NEMBA, the CITES and TOPS Regulations as well as the relevant provincial legislation (where applicable).


 CONVENTION ON  
INTERNATIONAL TRADE IN  
ENDANGERED SPECIES OF  
WILD FAUNA AND FLORA

 EXPORT  
RE-EXPORT  
IMPORT  
OTHER

ORIGINAL

2. Valid until 25-09-2018

3. Importer (name and address)

Roger Ditto

(b) (6)

4. Exporter / Re-exporter (name, address and country)

 True Reflections Taxidermy  
Rosedale Farm  
Grahamstown  
6139, RSA

3a. Country of import U.S.A.

5. Special conditions

 Tops integrated permit  
Blocks 14 & 15 must be completed prior to export.  
Replacement of Cites No. 20259 dated 20.11.2013 which will be expired in Aug 2018

5a. Purpose of the transaction (see reverse)

5b. Security stamp No.

H 1372408

6. Name, address, national seal / stamp and country of Management Authority

 Department of Environmental Affairs  
Private Bag X447  
PRETORIA  
0001  
SOUTH AFRICA

 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 Philantomba Monticola Blue duiker

9 Full mount with 1 ynx

10 TLW

11 One (1)

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 \*\*\*

B 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 \*\*\*

C 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 \*\*\*

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

2018-03-26

13. THIS PERMIT / CERTIFICATE IS ISSUED BY:

A.B. MZAMO

Bhisho

Place

26-03-2018

Date

PIDAG 40054 INGXOWA FYODWV V054

 EK  
DIE


Security stamp, signature and official seal

14. EXPORT ENDORSEMENT:

15. Bill of Lading/Air Waybill Number:

Block	Quantity
A	
B	
C	
D	

Port of Export

Date

Signature

Official stamp and title





**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.

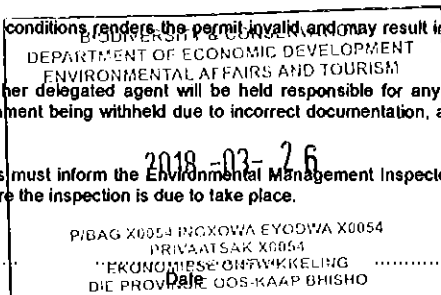
**THE FOLLOWING CONDITIONS ARE APPLICABLE TO:**

- (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 7.
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 – 16:30):  
Office: +27 (11) 390-3887/ 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, Waybill/s and Bill of entry/s (SAD/ DA 550) must be presented for inspection. 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 and Waybill/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. Only A person authorized thereto by the Premier or Minister may 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.

A. M. M. M.  
Signature of Issuing Officer  
A. B. M. M. M.  
Full Name



\_\_\_\_\_  
Signature of Recipient  
\_\_\_\_\_  
Date

Conditions to this permit have been issued in terms of the applicable provisions of the NEMBA, the CITES and TOPS Regulations as well as the relevant provincial legislation (where applicable).


**ORIGINAL**

PERMIT / CERTIFICATE № 209921



**CONVENTION ON  
INTERNATIONAL TRADE IN  
ENDANGERED SPECIES OF  
WILD FAUNA AND FLORA**

<input checked="" type="checkbox"/>	EXPORT
<input type="checkbox"/>	RE-EXPORT
<input type="checkbox"/>	IMPORT
<input type="checkbox"/>	OTHER

2. Valid until 25-01-2018

3. Importer (name and address) (b) (6)		4. Exporter / Re-exporter (name, address and country) The Department of Environmental Affairs Private Bag X447 Pretoria 0001 South Africa	
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. 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)	5b. Security stamp No.		

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							
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 ***	
B							
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 ***	
C							
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 ***	
D							
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 Appendix I species)		** 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				2018-03-26	
Place: _____ Date: _____				Security stamp, signature and official seal P/BAG X0054 INGYOWA EYODWA X0054 PRIVAATSAK X0054 EKONOMIESE ONTWIKKELING DIE PROVINSIE OOS-KAAP BHISHO	

14. EXPORT ENDORSEMENT:		15. Bill of Lading/Air Waybill Number:	
Block	Quantity	Port of Export	Date
A			
B			
C			
D			
		Signature	Official stamp and title

**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.

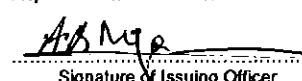

Import permits are not valid unless the imported consignment is accompanied by a valid (original) export permit from the country/ province of origin (if required), which must be handed to the authorized Environmental Management Inspector on inspection.

**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 7.
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, Waybill/s and Bill of entry/s (SAD/ DA 550) must be presented for inspection. 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 and Waybill/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. Only A person authorized thereto by the Premier or Minister may 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.

 Signature of Issuing Officer  Signature of Recipient	BIODIVERSITY & CONSERVATION DEPARTMENT OF ECONOMIC DEVELOPMENT AND ENVIRONMENTAL AFFAIRS PRIVATE X0054 EKONOMIESE ONTWIKKELING DIE PROVINSIE OOS-KAAP BHISHO	Date Full Name
---	---	-------------------

Conditions to this permit have been issued in terms of the applicable provisions of the NEMBA, the CITES and TOPS Regulations as well as the relevant provincial legislation (where applicable).



**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: 1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

Type of Activity

**IMPORT OF SPORT-HUNTED TROPHIES OF BONTEBOK  
TROPHIES FROM SOUTH AFRICA**

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 <b>DITTO</b>	1.b. First Name <b>Roger</b>	1.c. Middle Name/Initial <b>(b) (6)</b>	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address

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

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

**Section C: All applicants complete address information**

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) <b>(b) (6)</b>			
1.b. City <b>SPRINGFIELD</b>	1.c. State <b>WA</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.f. Country <b>USA</b>
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.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 <b>Title 50 Part 13 of the Code of Federal Regulations</b> 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>Roger Ditto</b> <b>03-26-2018</b>
Please continue to next page



Good morning sir:

My sincere apologies Mr. Rivera. Please find the updated page attached.

I also wanted to let you know that my CITES Export Permit from South Africa has been renewed because of the potential for it to expire before my import permit had been issued. Please see new permit attached as well.

And don't hesitate to let me know if there's anything else.

Roger Ditto  
425-238-5597

From: [Rivera, Luis](#)  
Sent: Thursday, April 12, 2018 8:12 AM  
Subject: PRT# 84786c

2 Attachments



PDF Ditto- Dated Page ...



PDF Ditto- Renewed C ...





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 <b>HOGAN</b>	1.b. First Name <b>KEVIN</b>	1.c. Middle Name/Initial <b>(b) (6)</b>	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address

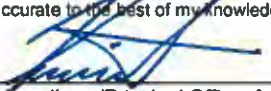
## Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or Institution

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

## Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #: no P.O. Boxes) <b>(b) (6)</b>				
1.b. City <b>TAYLOR RIDGE</b>	1.c. State <b>ILLINOIS</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>UNITED STATES</b>
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) <b>05/08/2018</b>
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)?

(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. *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: 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:  
South Africa, Mapungubwe Game Reserve, Alldays, Vhembe District  
b. Date wildlife was hunted:  
July 7, 2017

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

Mr. E. Small (PH and Outfitter)

- 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]:

Safari Cargo, 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 separate attached documents.*
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. Pieter Erasmus

Business Name: Safari Cargo

Address: Holding 34, 5th Avenue, Bredell, 1623

City: Gauteng

State/Province:

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?

Yes - see separate information 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?

License fee: R 5000 (\$400) was paid to the government, trophy fee: \$ 40,000, some of it was allocated to the community as per data and landowner used some.

- 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

Yes - see separate information 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: 5/8/2018

*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).

**Duration of Hunt:**

Commenced

Terminated



A. LP No 66195

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)
------------------------	--------------------	-----------------	--------------------------	--------------------	---------------------	-----------------------	----------------------	-----------------------

**POST PERMIT TO (Mark correct block with X)**

PROFESSIONAL HUNTER	
Name <i>E. Small</i>	
Business Address <i>P.O. Box 123</i>	
<i>All day</i>	
<i>0909</i>	
ID No. <i>630910506487</i>	
PH Permit No. <i>2A12P/170/6754</i>	
Date <i>8/7/07</i>	Signature <i>[Signature]</i>

CLIP [REDACTED] (b) (6)

Name: Kevin [REDACTED] (b) (6) Hogan

Permanent Postal Address: [REDACTED] (b) (6) (b) (6)


(b) (6) Taylor Ridge Illinois

Code: [REDACTED] (b) (6) S.A.

Passport: [REDACTED] (b) (6)

Tel/Fax: [REDACTED]

Date: 8/7/2007 Signature: [Signature]

HUNTING OUTFITTER	
Name	K. Small
Business Address	P.O. Box 123 Albany
ID No	6308105066087
Tel No	0795241635
HO Permit No	2010911491927
Date	8/7/2017
Signature	

[illegible]

**Copies:** Client

Original

1st copy..... Forward to Nature Conservation authority where hunt took place

### Hunting Outfitter

2nd copy..... Retain for a period of three years

## Professional Hunter

**Last copy** \_\_\_\_\_ **Remains in book**

Address to which trophies are to be sent: *As Arranged with*  
*Forisday*  
Country: *U.S.A.* Code \_\_\_\_\_  
Trophy Export Date (Estimate): \_\_\_\_\_

### 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 N° 12038

NAME	LEDET
ADDRESS	PO Box 10, Mmaka Erasmus
PROVINCE	LIMPOPO

NAME	KEVIN (b) (6)	OF PERMIT HOLDER
SURNAME	HOGAN	ID NO.
POSTAL ADDRESS		PASSPORT NO.
ADDRESS		RESIDENTIAL ADDRESS
ADDRESS		
ADDRESS		
TOWN		TAYLOR RIDGE
POSTAL CODE		ILLINOIS
PROVINCE		USA

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT	
NAME AND SURNAME OF APPLICANT	Mr. K. (b) (6) HOGAN
NAME AND SURNAME: RESPONSIBLE PERSON	Mr. E. (b) (6) SMALL
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	MARINKUBWE GAME RESERVE
PHYSICAL ADDRESS OF FACILITY	ALDAYS
DISTRICT	NHEMBE
PROVINCE	LIMPOPO
REGISTERED NAME AND NUMBER (in the case of game farm)	MARINKUBWE GAME RESERVE

DETAILS OF SPECIES INVOLVED				
COMMON NAME	SPECIES	SEX (if known)	QUANTITY	MARKING (if applicable)
ELEPHANT	LOXODONTA AFRICANA	MALE	001 (ONE)	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED	
TO HUNT ONE CITES MALE ELEPHANT ON THE PROPERTY - MARINKUBWE GAME RESERVE - ALDAYS NHEMBE - LIMPOPO BY AN OVERSEAS CLIENT FROM USA.	

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)	Mr. K. (b) (6) HOGAN
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	Mr. E. (b) (6) SMALL
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	Mr. E. SMALL
WEAPON AND METHOD OF HUNTING	RIFLE - 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	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION	
PERIOD OF VALIDITY	FROM: 03/01/2017 TO: 03/08/2017
RECEIPT NUMBER	1095865 - AMOUNT = R/5400-00
SIGNATURE OF ISSUING OFFICER:	SIGNATURE OF PERMIT HOLDER:
DATE STAMP:	
LOUIS TRICHARDT CENTRE	
2017-07-03	

## Elephant Management Plan Annual Report for year 2016

Survey Data will be conducted every 2 years and the next survey is planned for June 2019 (Dr. Gerhard De Beer)

### Area

**Mapungubwe Game Reserve** is 25000 ha big and open with Botswana on the Northern and western border.

It was opened up from ten fenced in properties to one big area open with Botswana to allow more area for the Tuli elephants.

Elephants have become resident since the year 2000 as we opened the fences to have more range for the plus minus 1400 elephants roaming the area. ( See attached detail of air count)

### Management Actions

#### *Fences:*

The condition of the Fences are deteriorating on our Northern boundary along Limpopo River and Eastern area bordering with Mapungubwe National Park due to elephant activity. The fence from middle Modena North up to Den Staat road have been repaired.

Along our Western Boundary with Breslau and Eendvogelpan, the electrical fences have been completed but we had to repair the Breslau fence once, and Eendvogelpan fence once during 2016 due to elephant activity.

Our Southern fence are in fairly good condition with elephant breaking threw but gets repaired.

The South Eastern Fence bordering Lauriston and Montique are constantly being broken, by elephants and neighbours keep feeding along fence to attract animals including elephants.

#### *Degraded Area's:*

On farms Parma and Montrow, a lot of erosion repair work has been done, as well as on Vergenoegd and Kruidfontein. The dam wall that broke on Vergenoegd washed away a lot of roads but was filled and repaired.

We have lost the dam walls at Vergenoegd, due to elephants working of the walls going over the walls to drink and bath in the water. This damage will still have to be assessed. The wall at Lelie dam showed deterioration and we do not think it will withstand this coming rainy season. This wall was repaired in 2014 to the extent of R2milj

#### *Fire Management Plan:*

Due to sparse ground cover and a very good road system, our fire risk is extremely low. We do have adequate fire-fighting equipment and personnel.

#### *Water Provision:*

We have three big dams that supply the main water to the animals and also the Limpopo River on our West and North. One of these dams were extensively damaged by elephants, and another is close to the point of the dam wall washing away. Another supply in the form of a borehole will supply water the animals during the drier period.

### Game Management

#### *Game Census Frequency:*

Due to a lot of hunting, tourism and surveying activity we had during 2016 and a lot of helicopters were use, the game-count was on-going and reported daily when people were out for their activities. On 29 July 2016 till 5 August 2016 an official game count was conducted at the waterholes as well as with the use of 2 helicopters. This accounted for a total of 441 elephants on 1 Aug 2016. This show an increase in elephant numbers, the biggest increase due to more elephants moving in from Botswana on our Northern boundary. The increase in damage to trees and infrastructure are also more in these areas.

On 8 February 2016 a Nature Conservation Officer flew with helicopter on the property and elephants were recorded. These groups were monitored by helicopter from the 7<sup>th</sup> February till 9<sup>th</sup> February and was a total of 158 elephants at one-time on farms Somerville, Parma and Vergenoegd.

Professional hunters and guides are instructed to record sightings especially elephant.

Helicopter Pilots were also task with reporting sightings and was then recorded by Eugene Small.

Any sightings by guests and owner were also recorded.

A drone was acquired and this will be used to identify groups of elephant.

*Desired Stocking Density:*

***The desired stocking density is reflected in our Management plan and is <1 elephant per sq km but at this stage it is 9,6 elephant per sq km (EMP) (Ex max 100 elephant EMP Pg 124 Section 4:12)***

*Current Stocking Density:*

As per our census with reference to Section E 5.4 Page 137, we have 276 resident and ? migratory elephants. The Model stocking rate should be 100 Max. (Stocking Capacity Section 4:12 C Pg 124)

The damage to our infrastructure and environment are a sign of increased elephant activity.

Alterations to stocking density can be made after Habitat Condition Assessment this year if needed.

Some Herd numbers were in excess of 80 animals per herd. 121 on Modena , 118 on Vergenoegd.

We are identifying herds of elephant that were not previously identified on Mapungubwe Game Reserve. Noted was a herd of 121 on Modena, individuals that were identified by four cows with extremely long tusks, and 3 mature bulls with this specific herds. (We would like to collar one of these cows in 2017 to get more information of this specific herd)

In 2013 a herd of 236 stayed on Mapungubwe Game Reserve and was chased a few months later by helicopter back to Botswana. (Refer to Nature Conservation officials)

*Game Management Action:*

According to Scholes and Mennell 2008, elephant population increases 100% every 10 to 13 years.

From 2000 we saw a definite increase in the elephant population on Mapungubwe and since 2011 we started to do more research and monitoring threw School of Life Science of University of Kwa Zulu Natal (Annekke Bedetti) Refer to Elephant management Plan.

As the carrying capacity of Mapungubwe Game reserve allows for a total of 100 elephants, we see that the current population, resident and nomadic are far exceeding this.

An application will be submitted for 10 Cities elephant. We only hunted 3 in 2017 as the permit quota was issued late in 2016 and thus had only half a year to market and hunt these elephants.

We have collared an elephant cow which is part of one herd which consists of 87 individuals. (Attached data)

Also the selling of these animals to foreign hunters, which supply most of the income to run the farm, (90%) are very erratic due to uncertainty about Cities regulations to different countries as well as political uncertainty here and abroad.

We also have built and maintain an orphanage in the town of Alldays where we also feed 162 children, where income from elephant hunting is used.

We are in constant communications with School of Life Science of University of Kwa Zulu Natal which have been doing research on the total population of elephant in our area.

## **Elephant Management**

*Desired Total elephant Population Range:*

As indicated by our Environmental Management Plan, the desired range is 100 individuals.

*Desired Adult Sex Ratio Range:*

*Elephant Census Frequency:*

Elephant census are done on an on-going process and for this all staff are motivated to report elephant activity. All tourist and guides are also asked to report any elephant activity and report and record elephant sightings.

*Census Methods:*

Any aircraft that are used for transport or game capture must report any elephant activity and numbers. This is then recorded.

A drone will be used to photograph groups and individuals as weather and time permits.

*Method of elephant reduction*

**An application has been submitted for 10 Cities elephants.**

**We would suggest to have a set quota of 15 animals (Ref Management Plan) for 5 years as can be clearly seen that the deteriorating of Mapungubwe Game Reserve as a hole, is happening at an alarming rate and that current method is not slowing down destruction. According to the game count in July/ Aug 2016 the elephant numbers are increasing and if we can get an approved quota for 5 years, we will be better off in planning the hunts spread out over the whole year in advance. This will help with short term management in keeping Nomadic herds away, and will be a good indication on resident herd growth to see if our take-off need to be adjusted accordingly.**





**Rahmqvist**

**Foundation**



## RAHMQVIST FOUNDATION CENTRE

“All children are entitled to a good start in life with care and a safe shelter. I therefore founded Rahmqvist Foundation in order to build and run an orphanage, to give homeless and vulnerable children a safe place to grow up in.”

**LEIF RAHMQVIST**  
Founder and Protector

# BACKGROUND

Close to my ranch in South Africa there is the town of Alldays. It is a small country town with lots of poverty, homelessness, unemployment and disease. There are many children having lost one or both their parents to AIDS and other diseases. The children are often living in very vulnerable situations, without any adult care. Their one meal a day they get by a Drop-In Centre run by local women. This is not the way children shall live! All children are entitled to a good start in life with shelter and proper care! I therefore founded Rahmqvist Foundation in order to build and run an orphanage to give children a place where they can be safe, get enough to eat, hygiene, health care, education, a bed of their own and not at least to play.





# ORPHANAGE

To strengthen the orphanage organization we are establishing a partnership with Norsa Community Care.



# SKILL SCHOOL

We are now taking the next step in the project through the start-up of Rahmqvist Foundation Skill School. The skill school will offer young people leaving school a professional training to be bricklayers, seamstresses, bakers, chefs, masseuses or hairdressers.



# WANT TO HELP?

Rahmqvist Foundation Centre is a charity project. All funds raised go directly to the Centre and to the benefit of the children. We are extremely grateful for all contributions, large and small, from individuals, businesses, organizations, schools and others!



# PHOTOGALLERY

# CONTACT US



**Rahmqvist**  
**Foundation**



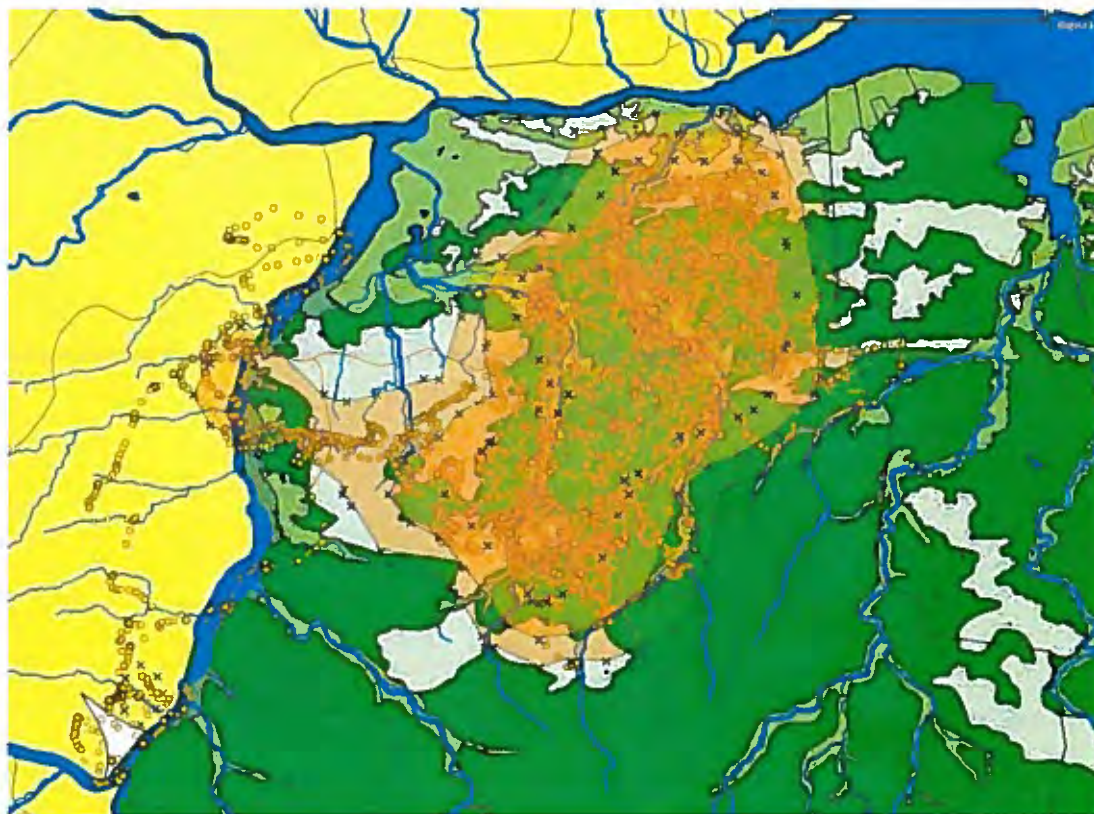
## Elephant collared

One adult elephant cow, was darted and a collar fitted on 13 March 2015.

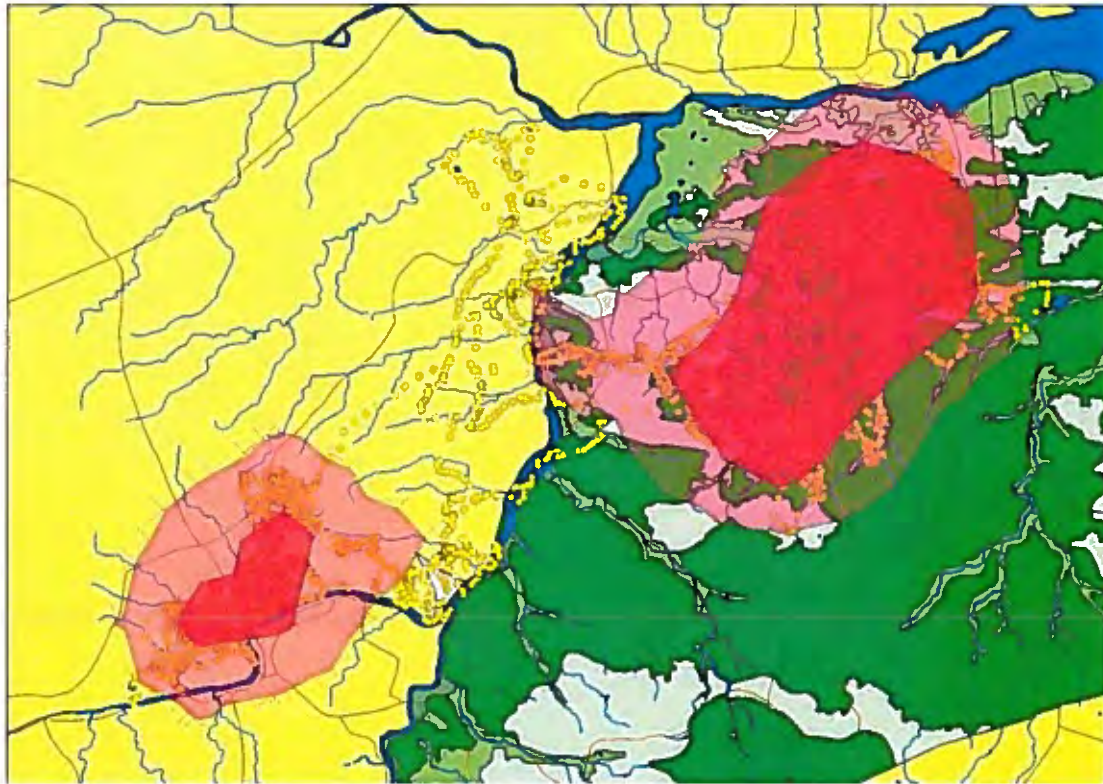
She was named Leila and is still part of one herd which consists of 89 animals.

With collar data it was established that this specific herd spend just over 11 months a year on Mapungubwe Game Reserve.

Leila: May to October 2016



Leila: May to January



## ELEPHANT AERIAL CENSUS OF THE CENTRAL LIMPOPO RIVER VALLEY, SOUTHERN AFRICA REPORT SUMMARY SEPTEMBER 2012

### Research Synopsis

In recent times, more and more questions have been asked on whether an increase in elephant numbers will lead to the ultimate destruction of an area.

Elephants are perceived to be a keystone species that determine the structure and composition of their habitats. This contention has in turn lead to claims that elephants at high numbers pose a threat to biodiversity in the conservation areas in which they occur. Little, however, is known on how elephant populations are limited and how co-existence between elephants and trees was achieved in the past. In order to understand elephant and tree dynamics a reliable understanding of what environmental and social factors influence elephant movements and the occupancy of different habitats is needed. This has led to the initiation of the Central Limpopo River Valley elephant research project in 1999 and is an ongoing program.

Since 2000, as part of the project six total aerial counts of the elephant population has been conducted to determine their range and numbers. In recent years the development of the Greater Mapungubwe Transfrontier Conservation Area, developing agriculture, mining, dam construction and increased human densities in the region, have influenced the range and the movements of elephants within the region.

Since 2005, increasing numbers of elephants have moved into Mapungubwe National Park and on several properties in South Africa where fence breakages between properties are reported on a near weekly basis. Extensive poaching and control hunting is also being reported and could influence population numbers and movements dramatically. Aerial surveys provide information on numbers, group structure and distribution that are important baseline data pertinent to basic ecological questions and conservation planning and management.

### Methodology

This year's aerial survey of the area was undertaken on the 9th and 10th September 2012.

The methodology was similar to those of previous years. Three fixed wing airplanes (Cessna 206; two C182T) were used to count the study area simultaneously. A team consisting of a pilot, navigator and two observers on each side of the plane were used.

On day one the Northern Tuli Game Reserve (Botswana), the Tuli Block from the Motloutse River to Zanzibar and Sentinel Ranch, Nottingham Estate, River Ranch (Zimbabwe) were counted. On day two the Tuli Circle in Zimbabwe and Mapungubwe National Park, **Mapungubwe Private Reserve** and farms bordering the Limpopo River in South Africa were counted.



A herd of elephants seen from the airplane.



## Results

During the 2012 count a total of 1291 elephants were counted.

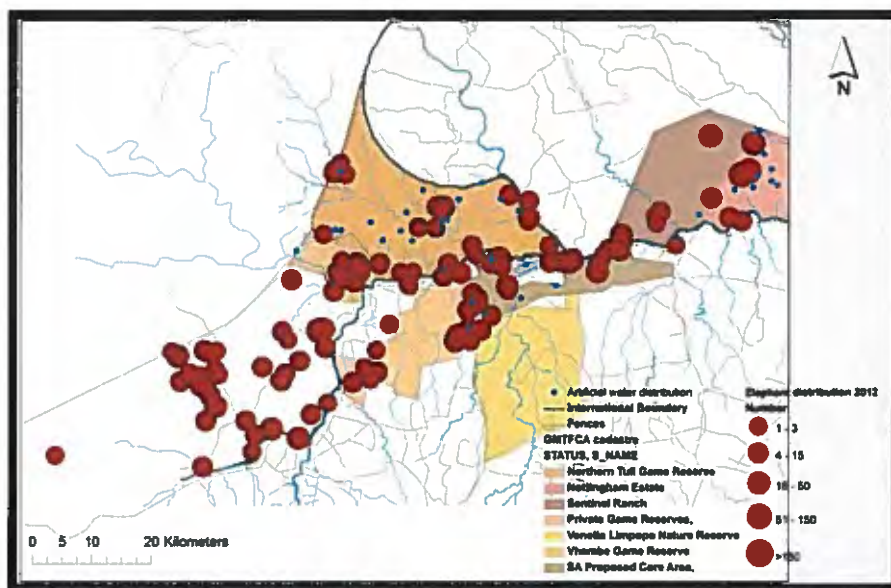


Figure 1: Elephant distribution and group sizes during the September 2012 total aerial count conducted in the Central Limpopo River Valley

Management Area	Total Counted						
	Aug 00	Jul 01	Oct 04	Jun 07	Aug 08	Sep-10	Sep-12
Botswana - NTGR	512	877	291	603	476	461	320
RSA - Mapungubwe National Park	0	10	2	115	33	210	127
RSA - Farms	5	5	5	0	53	72	123
Zimbabwe - Tuli Safari Area	57	0	0	3	0	0	0
<b>Sub total</b>	<b>574</b>	<b>892</b>	<b>298</b>	<b>721</b>	<b>562</b>	<b>743</b>	<b>570</b>
Botswana - BDMRF	373	288	522	244	636	190	368
Zimbabwe - Nottingham & Sentinel	170	104	20	115	31	304	353
Zimbabwe - Zhove Dam	0	0	250	0	0	0	0
<b>Sub total</b>	<b>170</b>	<b>104</b>	<b>270</b>	<b>115</b>	<b>31</b>	<b>304</b>	<b>353</b>
Shashe Riverine	120	10	0	0	0	0	0
Botswana - Letsibogo Dam	25	0	150	0	0	0	0
Botswana Communal Area	0	0	0	0	0	0	0
<b>Sub total</b>	<b>145</b>	<b>10</b>	<b>150</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>TOTAL</b>	<b>1262</b>	<b>1294</b>	<b>1240</b>	<b>1080</b>	<b>1229</b>	<b>1237</b>	<b>1291</b>

Table 1: Comparison of the results of the seven total aerial counts of the Central Limpopo Valley elephant population. NTGR – Northern Tuli Game Reserve, MNP – Mapungubwe National Park, TSA – Tuli Safari Area, BDMRF – Baines Drift to Motloutse River Farms, SNRC – Sentinel Ranch, Nottingham Estate, River Ranch Complex, LDNS – Letsibogo Dam and Northern Shashe Area, MTRR – Motloutse and Thune Riverine

For any additional information or the full report of the Aerial Count study, please don't hesitate to send an email to:

- Eugene Small [vhembe@lantic.net](mailto:vhembe@lantic.net)

Kind regards,







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: 1A  
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 <b>Lipworth</b>	1.b. First Name <b>Alexander</b>	1.c. Middle Name/Initial <b>(b) (6)</b>	1.d. Suffix <b>(b) (6)</b>
2.a. Alternate Telephone Number <b>(b) (6)</b>		2.b. Address <b>(b) (6)</b>	

**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>(b) (6)</b>				
1.b. City <b>Opalocka</b>	1.c. State <b>FL</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>
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) <div style="text-align: right;"><b>Lipworth</b>      <b>05/07/2018</b></div>	

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.  
Attn: Jeremy Delacruz  
434 2022 place  
South S.F., CA 94080

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

(b) (6)

Jeremy Delacruz 415-872-1225 jdelacruz@coppersmith.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.

N/A

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).

N/A

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, NYAE - NYAE Conservancy  
Otjozondjupa Region  
Nearest city: Tsumkwe

- b. Date wildlife is to be hunted:

September 15 - October 3 2018

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

S.M. Jacobs  
SM Safari  
Farm Andaster #915 PO Box 601  
Grootfontein  
Namibia

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:

NIA

- 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).
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: S.M. Jacobs

Business Name: S.M. Safaris

Address: Farm Aandster #915, P.O. Box 601

City: Grootfontein

State/Province:

Country, Postal Code: Namibia

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?

NIA

- 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?

NIA

- 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

NIA

**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: *A. Symon* Date: 05/07/2018

*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).



# MINISTRY OF ENVIRONMENT AND TOURISM

Directorate Natural Resources Management  
Private Bag 13306  
Windhoek, Namibia  
Enquiries: Chief Warden,  
Permit Office



Tel: +264-61-284 2111  
Fax: +264-61-258 861

PERMIT No.:

175477

VALID FROM:

18.10.17

VALID TO:

03.11.17

RECEIPT No.:

2169907

## PERMIT TO HUNT FOR TROPHIES

Permission is hereby granted in terms of the Nature Conservation Ordinance 1975 (Ord. 4 of 1975)

Name of Trophy Hunter:

A. (b) (6) Liphworth

Residential Address:

Country:

U.S.A

To hunt the specified number of game for the sake of trophies:

Indicates species listed on CITES  
Append I or II

SPECIES: COMMON NAME	Number
Buffalo	/
Crocodile	/
Dik-dik	/
Eland	/
Elephant	2x
Giraffe	/
Grey Duiker	2x
Hippopotamus	/
Impala, Black-faced	/
Impala, common	/
Klipspringer	/
Kudu	2x
Lechwe	/
Oryx (Gemsbok)	2x
Ostrich	2x
Red hartebeest	1x
Reedbuck	/
Rhinoceros, black	/
Rhinoceros, white	/
Roan	1x
Sable	/
Springbok	/

SPECIES: COMMON NAME	Number
Steenbok	1x
Warthog	1x
Waterbuck	/
Wildebeest, blue	2x
Zebra, Burchell's	/
Zebra, Hartman's mountain	/
Blesbok	/
Wildebeest, black	/
Cheetah	/
Leopard	/
Lion	/
Other	/

\*Report back within  
48 hours after hunt

on the following farms / hunting concessions:

Nyae - Nyae Conservancy

Guided by (name of guides):

S.M. Jacobs

MINISTRY OF ENVIRONMENT & TOURISM

Archie R. Hobbs

ISSUING OFFICER (NAME & SIGNATURE)

UNDER THE AUTHORITY OF THE MINISTER,  
POHAMBIA SHIFETA IN TERMS OF SECTION  
78(L) OF THE NATURE CONSERVATION  
ORDINANCE, 1975 (ORDINANCE NO. 4  
OF 1975) AS AMENDED.

Official MET date stamp

17 OCT 2017 11:10

2017-10-11

IMPORTANT: This permit is not valid if altered in anyway

175 477

[illegible]

Reported by: Scovsen. 2/4/10/2017

- 907





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 <b>HOGAN</b>	1.b. First Name <b>KEVIN</b>	1.c. Middle Name/Initial <b>(b) (6)</b>	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address

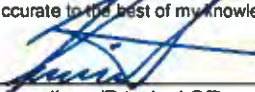
### Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or Institution

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

### Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #: no P.O. Boxes) <b>(b) (6)</b>				
1.b. City <b>TAYLOR RIDGE</b>	1.c. State <b>ILLINOIS</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>UNITED STATES</b>
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) <b>05/08/2018</b>
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)?

[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. *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: 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:  
South Africa, Mapungubwe Game Reserve, Alldays, Vhembe District  
b. Date wildlife was hunted:  
July 7, 2017



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

Mr. E. Small (PH and Outfitter)

- 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]:

Safari Cargo, 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 separate attached documents.*
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. Pieter Erasmus

Business Name: Safari Cargo

Address: Holding 34, 5th Avenue, Bredell, 1623

City: Gauteng

State/Province:

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?

Yes - see separate information 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?

License fee: R 5000 (\$400) was paid to the government, trophy fee: \$ 40,000, some of it was allocated to the community as per data and landowner used some.

- 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

Yes - see separate information 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: 5/8/2018

*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).

**Duration of Hunt:**

Commenced

Terminated



A. LP No 66195

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

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	<del>Limpopo Province (LP)</del>	North West (NW)	Mpumalanga (MPA)	Western Cape (CNC)	Eastern Cape (EC)	Northern Cape (NC)
------------------------	--------------------	-----------------	--------------------------------------	--------------------	---------------------	-----------------------	----------------------	-----------------------

**POST PERMIT TO (Mark correct block with X)**

PROFESSIONAL HUNTER	
Name <i>E. Small</i>	
Business Address <i>P.O. Box 137</i>	
<i>All day</i>	
<i>0909</i>	
ID No. <i>630910506687</i>	
PH Permit No. <i>2A12P/170/6754</i>	
Date <i>8/7/07</i>	Signature <i>[Signature]</i>

CLIP [REDACTED] (b) (6)

Name: Kevin [REDACTED] Hogan (b) (6)

Permanent Postal Address: [REDACTED] (b) (6)

[REDACTED] Taylor Ridge Illinois (b) (6)

Code: [REDACTED] S.A. (b) (6)

Passport: [REDACTED] (b) (6)

Tel/Fax: [REDACTED]

Date: 8/7/2007 Signature: [Signature]

HUNTING OUTFITTER	
Name <i>E. Small</i>	
Business Address <i>P.O. Box 123</i>	
<i>Albany</i>	Code <i>0909</i>
ID No <i>6309105066087</i>	
Tel No: <i>0795241635</i>	Fax No:
HO Permit No <i>2010911491927</i>	
Date <i>8/7/2017</i>	Signature <i>[Signature]</i>

[illegible]

**Copies:** Client

Original

1st copy..... Forward to Nature Conservation authority where hunt took place

### Hunting Outfitter

2nd copy..... Retain for a period of three years

## Professional Hunter

**Last copy** \_\_\_\_\_ **Remains in book**

Address to which trophies are to be sent: *As Arranged with*  
*Forisday*  
Country: *U.S.A.* Code \_\_\_\_\_  
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 N° 12038

NAME	LEDET
ADDRESS	PO Box 10, Mmaka Erasmus
PROVINCE	LIMPOPO

NAME	KEVIN (b) (6)	OF PERMIT HOLDER
SURNAME	HOGAN	ID NO.
POSTAL ADDRESS	(b) (6)	PASSPORT NO.
ADDRESS	(b) (6)	RESIDENTIAL ADDRESS
ADDRESS	(b) (6)	
ADDRESS	(b) (6)	
TOWN	AYLOR RIDGE	
POSTAL CODE	(b) (6)	
PROVINCE	USA	

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT	
NAME AND SURNAME OF APPLICANT	Mr. K. (b) (6) HOGAN
NAME AND SURNAME: RESPONSIBLE PERSON	Mr. E. (b) (6) SMALL
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	MARINGUBWE GAME RESERVE
PHYSICAL ADDRESS OF FACILITY	ALDAYS
DISTRICT	NHEMBE
PROVINCE	LIMPOPO
REGISTERED NAME AND NUMBER (in the case of game farm)	MARINGUBWE GAME RESERVE

DETAILS OF SPECIES INVOLVED				
COMMON NAME	SPECIES	SEX (if known)	QUANTITY	MARKING (if applicable)
ELEPHANT	LOXODONTA AFRICANA	MALE	001 (ONE)	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED
TO HUNT ONE CITES MALE ELEPHANT ON THE PROPERTY- MARINGUBWE GAME RESERVE- ALDAYS NHEMBE- LIMPOPO BY AN OVERSEAS CLIENT FROM USA.

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)	Mr. K. (b) (6) HOGAN
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	Mr. E. (b) (6) SMALL
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	Mr. E. SMALL
WEAPON AND METHOD OF HUNTING	RIFLE- 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	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION	
PERIOD OF VALIDITY	FROM: 03/01/2017 TO: 03/08/2017
RECEIPT NUMBER	1095865 - AMOUNT = R/5400-00
SIGNATURE OF ISSUING OFFICER:	SIGNATURE OF PERMIT HOLDER:
DATE STAMP:	
LOUIS TRICHARDT CENTRE	
2017-07-03	

## Elephant Management Plan Annual Report for year 2016

Survey Data will be conducted every 2 years and the next survey is planned for June 2019 (Dr. Gerhard De Beer)

### Area

**Mapungubwe Game Reserve** is 25000 ha big and open with Botswana on the Northern and western border.

It was opened up from ten fenced in properties to one big area open with Botswana to allow more area for the Tuli elephants.

Elephants have become resident since the year 2000 as we opened the fences to have more range for the plus minus 1400 elephants roaming the area. ( See attached detail of air count)

### Management Actions

#### *Fences:*

The condition of the Fences are deteriorating on our Northern boundary along Limpopo River and Eastern area bordering with Mapungubwe National Park due to elephant activity. The fence from middle Modena North up to Den Staat road have been repaired.

Along our Western Boundary with Breslau and Eendvogelpan, the electrical fences have been completed but we had to repair the Breslau fence once, and Eendvogelpan fence once during 2016 due to elephant activity.

Our Southern fence are in fairly good condition with elephant breaking threw but gets repaired.

The South Eastern Fence bordering Lauriston and Montique are constantly being broken, by elephants and neighbours keep feeding along fence to attract animals including elephants.

#### *Degraded Area's:*

On farms Parma and Montrow, a lot of erosion repair work has been done, as well as on Vergenoegd and Kruidfontein. The dam wall that broke on Vergenoegd washed away a lot of roads but was filled and repaired.

We have lost the dam walls at Vergenoegd, due to elephants working of the walls going over the walls to drink and bath in the water. This damage will still have to be assessed. The wall at Lelie dam showed deterioration and we do not think it will withstand this coming rainy season. This wall was repaired in 2014 to the extent of R2milj

#### *Fire Management Plan:*

Due to sparse ground cover and a very good road system, our fire risk is extremely low. We do have adequate fire-fighting equipment and personnel.

#### *Water Provision:*

We have three big dams that supply the main water to the animals and also the Limpopo River on our West and North. One of these dams were extensively damaged by elephants, and another is close to the point of the dam wall washing away. Another supply in the form of a borehole will supply water the animals during the drier period.

### Game Management

#### *Game Census Frequency:*

Due to a lot of hunting, tourism and surveying activity we had during 2016 and a lot of helicopters were use, the game-count was on-going and reported daily when people were out for their activities. On 29 July 2016 till 5 August 2016 an official game count was conducted at the waterholes as well as with the use of 2 helicopters. This accounted for a total of 441 elephants on 1 Aug 2016. This show an increase in elephant numbers, the biggest increase due to more elephants moving in from Botswana on our Northern boundary. The increase in damage to trees and infrastructure are also more in these areas.



On 8 February 2016 a Nature Conservation Officer flew with helicopter on the property and elephants were recorded. These groups were monitored by helicopter from the 7<sup>th</sup> February till 9<sup>th</sup> February and was a total of 158 elephants at one-time on farms Somerville, Parma and Vergenoegd.

Professional hunters and guides are instructed to record sightings especially elephant.

Helicopter Pilots were also task with reporting sightings and was then recorded by Eugene Small.

Any sightings by guests and owner were also recorded.

A drone was acquired and this will be used to identify groups of elephant.

*Desired Stocking Density:*

***The desired stocking density is reflected in our Management plan and is <1 elephant per sq km but at this stage it is 9,6 elephant per sq km (EMP) (Ex max 100 elephant EMP Pg 124 Section 4:12)***

*Current Stocking Density:*

As per our census with reference to Section E 5.4 Page 137, we have 276 resident and ? migratory elephants. The Model stocking rate should be 100 Max. (Stocking Capacity Section 4:12 C Pg 124)

The damage to our infrastructure and environment are a sign of increased elephant activity.

Alterations to stocking density can be made after Habitat Condition Assessment this year if needed.

Some Herd numbers were in excess of 80 animals per herd. 121 on Modena , 118 on Vergenoegd.

We are identifying herds of elephant that were not previously identified on Mapungubwe Game Reserve. Noted was a herd of 121 on Modena, individuals that were identified by four cows with extremely long tusks, and 3 mature bulls with this specific herds. (We would like to collar one of these cows in 2017 to get more information of this specific herd)

In 2013 a herd of 236 stayed on Mapungubwe Game Reserve and was chased a few months later by helicopter back to Botswana. (Refer to Nature Conservation officials)

*Game Management Action:*

According to Scholes and Mennell 2008, elephant population increases 100% every 10 to 13 years.

From 2000 we saw a definite increase in the elephant population on Mapungubwe and since 2011 we started to do more research and monitoring threw School of Life Science of University of Kwa Zulu Natal (Annekke Bedetti) Refer to Elephant management Plan.

As the carrying capacity of Mapungubwe Game reserve allows for a total of 100 elephants, we see that the current population, resident and nomadic are far exceeding this.

An application will be submitted for 10 Cities elephant. We only hunted 3 in 2017 as the permit quota was issued late in 2016 and thus had only half a year to market and hunt these elephants.

We have collared an elephant cow which is part of one herd which consists of 87 individuals. (Attached data)

Also the selling of these animals to foreign hunters, which supply most of the income to run the farm, (90%) are very erratic due to uncertainty about Cities regulations to different countries as well as political uncertainty here and abroad.

We also have built and maintain an orphanage in the town of Alldays where we also feed 162 children, where income from elephant hunting is used.

We are in constant communications with School of Life Science of University of Kwa Zulu Natal which have been doing research on the total population of elephant in our area.

## **Elephant Management**

*Desired Total elephant Population Range:*

As indicated by our Environmental Management Plan, the desired range is 100 individuals.

*Desired Adult Sex Ratio Range:*

*Elephant Census Frequency:*

Elephant census are done on an on-going process and for this all staff are motivated to report elephant activity. All tourist and guides are also asked to report any elephant activity and report and record elephant sightings.

*Census Methods:*

Any aircraft that are used for transport or game capture must report any elephant activity and numbers. This is then recorded.

A drone will be used to photograph groups and individuals as weather and time permits.



*Method of elephant reduction*

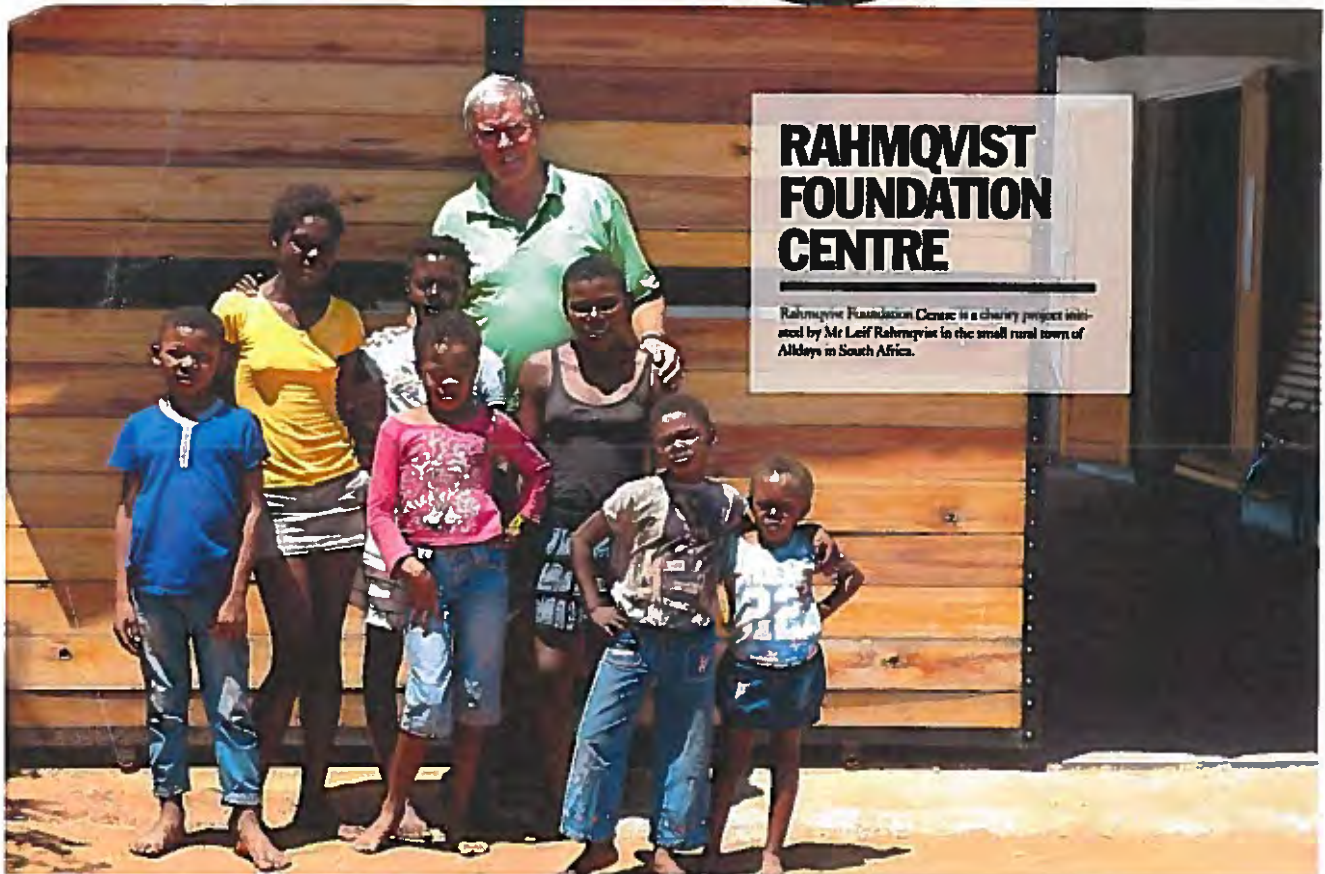
**An application has been submitted for 10 Cities elephants.**

**We would suggest to have a set quota of 15 animals (Ref Management Plan) for 5 years as can be clearly seen that the deteriorating of Mapungubwe Game Reserve as a hole, is happening at an alarming rate and that current method is not slowing down destruction. According to the game count in July/ Aug 2016 the elephant numbers are increasing and if we can get an approved quota for 5 years, we will be better off in planning the hunts spread out over the whole year in advance. This will help with short term management in keeping Nomadic herds away, and will be a good indication on resident herd growth to see if our take-off need to be adjusted accordingly.**



**Rahmqvist**

**Foundation**



## RAHMQVIST FOUNDATION CENTRE

“All children are entitled to a good start in life with care and a safe shelter. I therefore founded Rahmqvist Foundation in order to build and run an orphanage, to give homeless and vulnerable children a safe place to grow up in.”

**LEIF RAHMQVIST**  
Founder and Protector

# BACKGROUND

Close to my ranch in South Africa there is the town of Alldays. It is a small country town with lots of poverty, homelessness, unemployment and disease. There are many children having lost one or both their parents to AIDS and other diseases. The children are often living in very vulnerable situations, without any adult care. Their one meal a day they get by a Drop-In Centre run by local women. This is not the way children shall live! All children are entitled to a good start in life with shelter and proper care! I therefore founded Rahmqvist Foundation in order to build and run an orphanage to give children a place where they can be safe, get enough to eat, hygiene, health care, education, a bed of their own and not at least to play.





# ORPHANAGE

To strengthen the orphanage organization we are establishing a partnership with Norsa Community Care.



# SKILL SCHOOL

We are now taking the next step in the project through the start-up of Rahmqvist Foundation Skill School. The skill school will offer young people leaving school a professional training to be bricklayers, seamstresses, bakers, chefs, masseuses or hairdressers.



# WANT TO HELP?

Rahmqvist Foundation Centre is a charity project. All funds raised go directly to the Centre and to the benefit of the children. We are extremely grateful for all contributions, large and small, from individuals, businesses, organizations, schools and others!



# PHOTOGALLERY

# CONTACT US



**Rahmqvist**  
**Foundation**



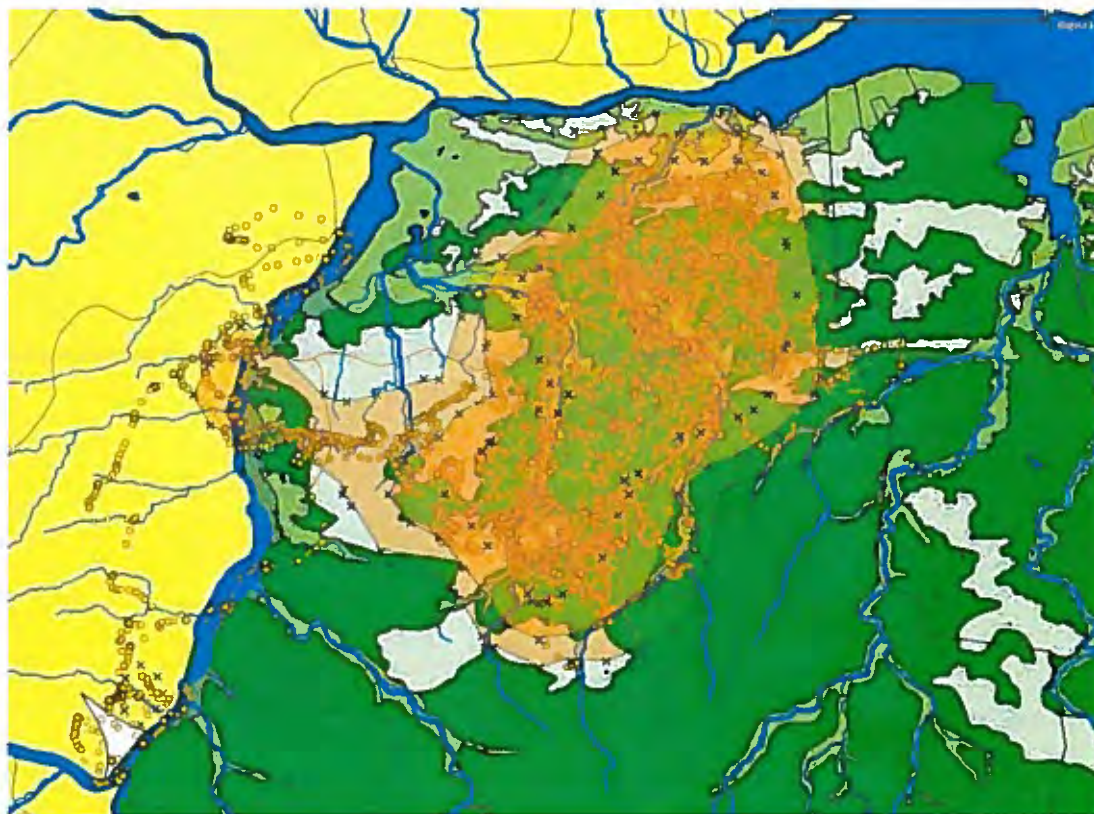
## Elephant collared

One adult elephant cow, was darted and a collar fitted on 13 March 2015.

She was named Leila and is still part of one herd which consists of 89 animals.

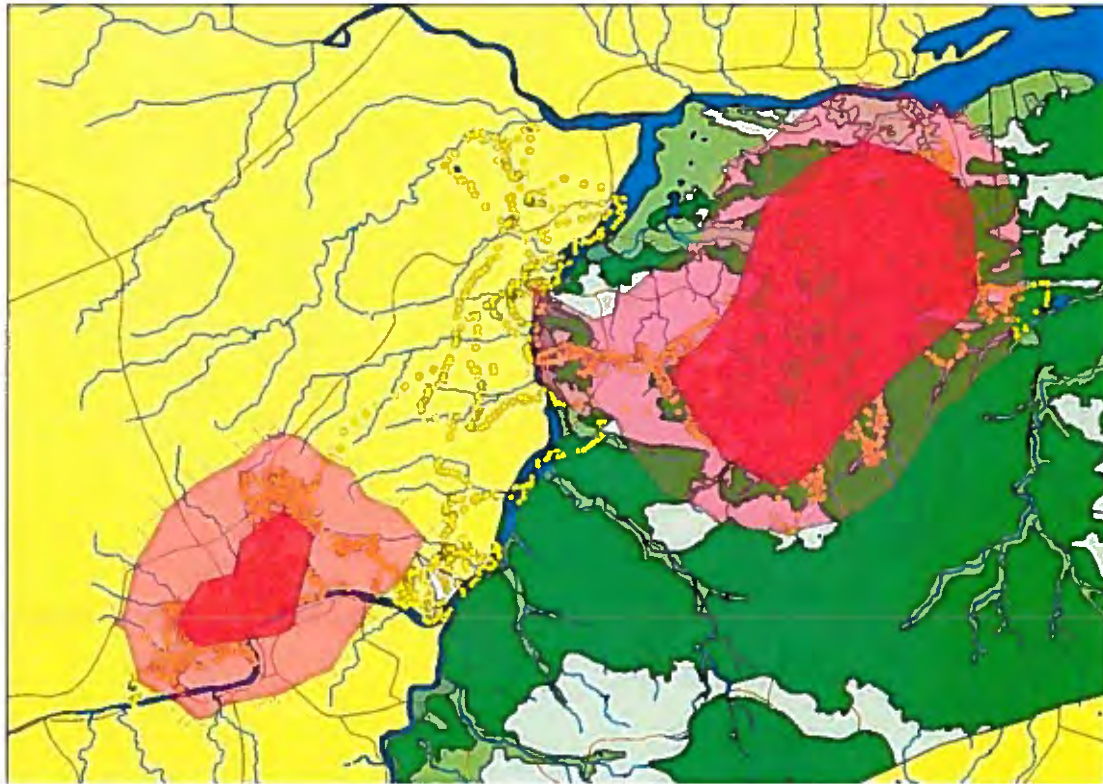
With collar data it was established that this specific herd spend just over 11 months a year on Mapungubwe Game Reserve.

Leila: May to October 2016





Leila: May to January



ELEPHANT AERIAL CENSUS OF THE CENTRAL LIMPOPO RIVER VALLEY,  
SOUTHERN AFRICA REPORT SUMMARY  
SEPTEMBER 2012

### Research Synopsis

In recent times, more and more questions have been asked on whether an increase in elephant numbers will lead to the ultimate destruction of an area.

Elephants are perceived to be a keystone species that determine the structure and composition of their habitats. This contention has in turn lead to claims that elephants at high numbers pose a threat to biodiversity in the conservation areas in which they occur. Little, however, is known on how elephant populations are limited and how co-existence between elephants and trees was achieved in the past. In order to understand elephant and tree dynamics a reliable understanding of what environmental and social factors influence elephant movements and the occupancy of different habitats is needed. This has led to the initiation of the Central Limpopo River Valley elephant research project in 1999 and is an ongoing program.

Since 2000, as part of the project six total aerial counts of the elephant population has been conducted to determine their range and numbers. In recent years the development of the Greater Mapungubwe Transfrontier Conservation Area, developing agriculture, mining, dam construction and increased human densities in the region, have influenced the range and the movements of elephants within the region.

Since 2005, increasing numbers of elephants have moved into Mapungubwe National Park and on several properties in South Africa where fence breakages between properties are reported on a near weekly basis. Extensive poaching and control hunting is also being reported and could influence population numbers and movements dramatically. Aerial surveys provide information on numbers, group structure and distribution that are important baseline data pertinent to basic ecological questions and conservation planning and management.

### Methodology

This year's aerial survey of the area was undertaken on the 9th and 10th September 2012.

The methodology was similar to those of previous years. Three fixed wing airplanes (Cessna 206; two C182T) were used to count the study area simultaneously. A team consisting of a pilot, navigator and two observers on each side of the plane were used.

On day one the Northern Tuli Game Reserve (Botswana), the Tuli Block from the Motloutse River to Zanzibar and Sentinel Ranch, Nottingham Estate, River Ranch (Zimbabwe) were counted. On day two the Tuli Circle in Zimbabwe and Mapungubwe National Park, **Mapungubwe Private Reserve** and farms bordering the Limpopo River in South Africa were counted.



A herd of elephants seen from the airplane.

## Results

During the 2012 count a total of 1291 elephants were counted.

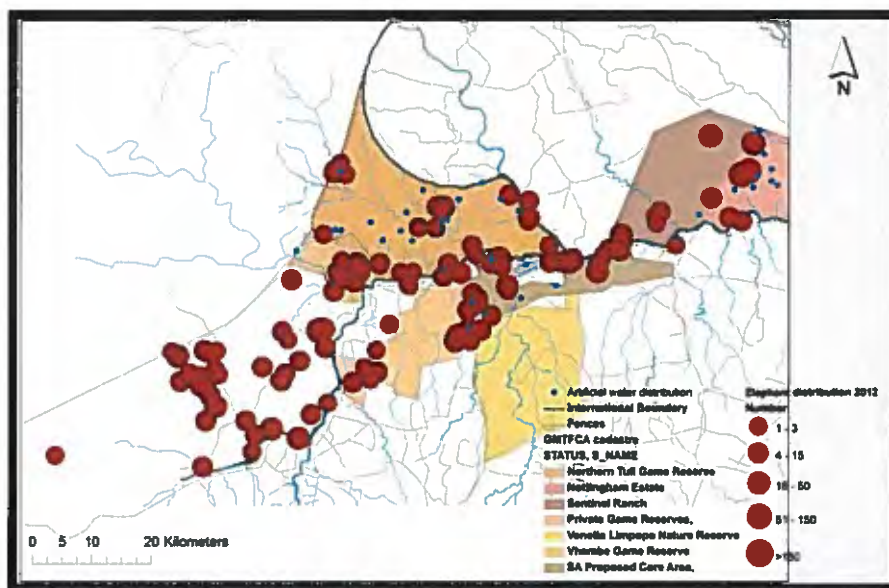


Figure 1: Elephant distribution and group sizes during the September 2012 total aerial count conducted in the Central Limpopo River Valley

Management Area	Total Counted						
	Aug 00	Jul 01	Oct 04	Jun 07	Aug 08	Sep-10	Sep-12
Botswana - NTGR	512	877	291	603	476	461	320
RSA - Mapungubwe National Park	0	10	2	115	33	210	127
RSA - Farms	5	5	5	0	53	72	123
Zimbabwe - Tuli Safari Area	57	0	0	3	0	0	0
<b>Sub total</b>	<b>574</b>	<b>892</b>	<b>298</b>	<b>721</b>	<b>562</b>	<b>743</b>	<b>570</b>
Botswana - BDMRF	373	288	522	244	636	190	368
Zimbabwe - Nottingham & Sentinel	170	104	20	115	31	304	353
Zimbabwe - Zhove Dam	0	0	250	0	0	0	0
<b>Sub total</b>	<b>170</b>	<b>104</b>	<b>270</b>	<b>115</b>	<b>31</b>	<b>304</b>	<b>353</b>
Shashe Riverine	120	10	0	0	0	0	0
Botswana - Letsibogo Dam	25	0	150	0	0	0	0
Botswana Communal Area	0	0	0	0	0	0	0
<b>Sub total</b>	<b>145</b>	<b>10</b>	<b>150</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>TOTAL</b>	<b>1262</b>	<b>1294</b>	<b>1240</b>	<b>1080</b>	<b>1229</b>	<b>1237</b>	<b>1291</b>

Table 1: Comparison of the results of the seven total aerial counts of the Central Limpopo Valley elephant population. NTGR – Northern Tuli Game Reserve, MNP – Mapungubwe National Park, TSA – Tuli Safari Area, BDMRF – Baines Drift to Motloutse River Farms, SNRC – Sentinel Ranch, Nottingham Estate, River Ranch Complex, LDNS – Letsibogo Dam and Northern Shashe Area, MTRR – Motloutse and Thune Riverine

For any additional information or the full report of the Aerial Count study, please don't hesitate to send an email to:

- Eugene Small [vhembe@lantic.net](mailto:vhembe@lantic.net)

Kind regards,



### 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





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:

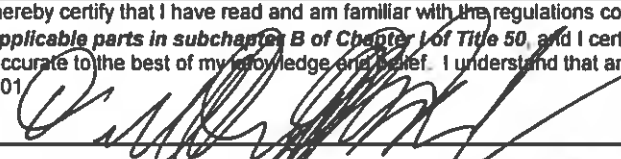
**IMPORT OF SPORT-HUNTED TROPHIES**  
(Appendix I of CITES and/or ESA)

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 Hirschfeld	1.b. First name Dennis	1.c. Middle name or initial (b) (6)	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 San Angelo	1.c. State Texas	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province	1.f. Country USA	
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)					
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country	

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee -- <b>attach documentation of fee exempt status as outlined in instructions.</b> (50 CFR 13.11(d))	
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in <b>Title 50, Part 13 of the Code of Federal Regulations</b> and the other <b>applicable parts in subchapter B of Chapter I of Title 50</b> , 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](mailto: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.

ELÉPHANT 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: September 17-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 TAXIDERM Y  
Address: BOX 11908 WINDHOEK, PLOT #3 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: \_\_\_\_\_

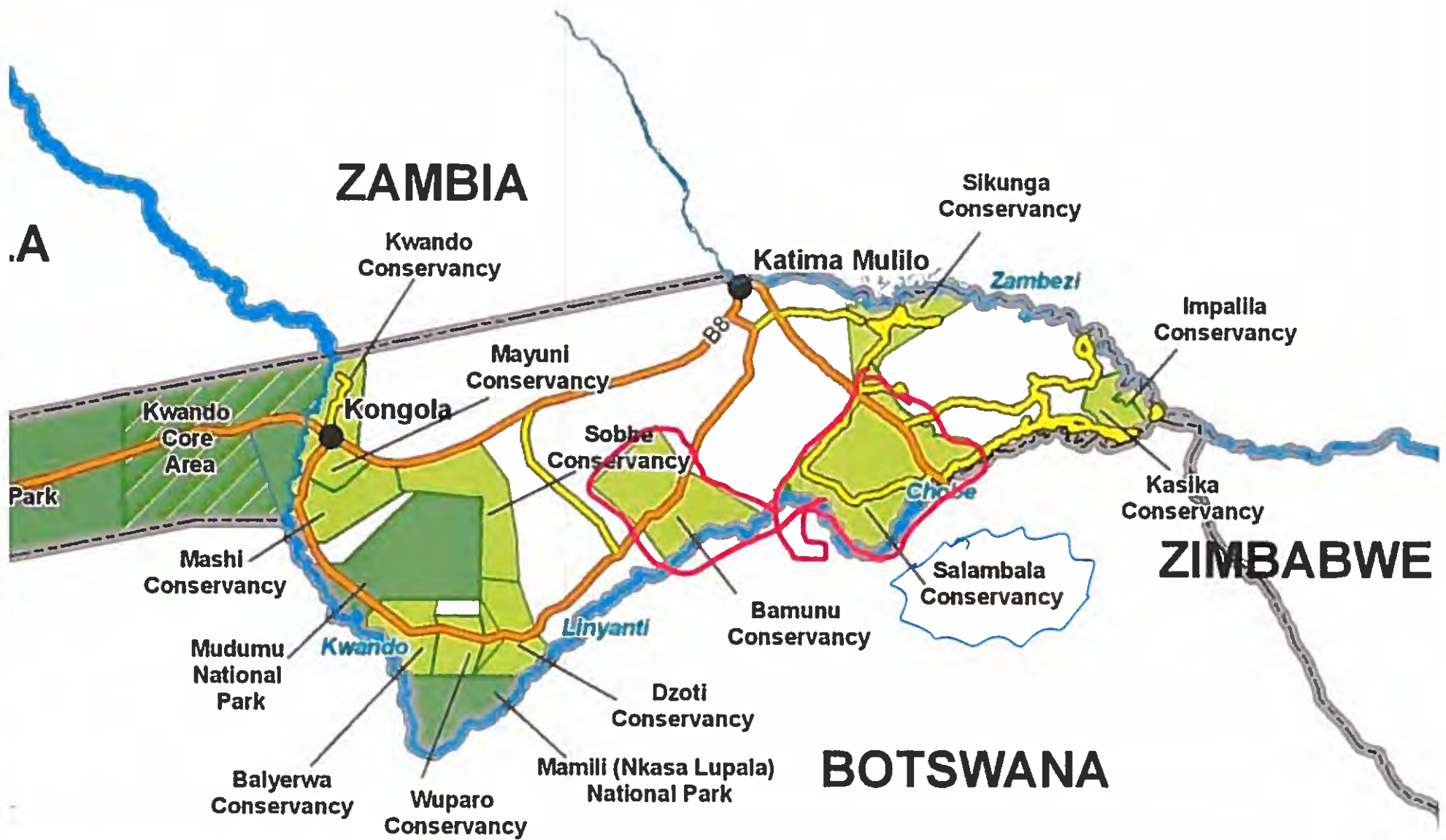
11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

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).







## 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 Thoulès† ‡

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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

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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; Igoc 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 com-

mercial 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. 2011b; 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

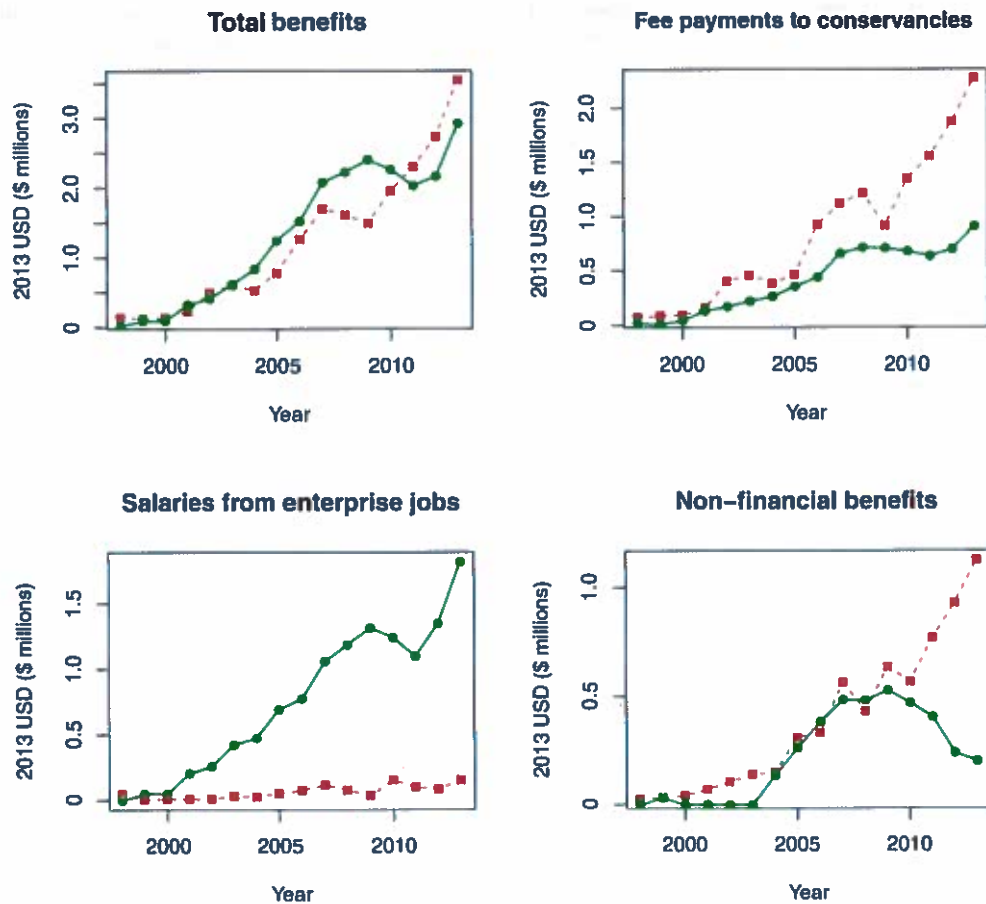
and changes in resource management policies affect such benefit flows on communal lands.

## 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 CB-NRM 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<sup>2</sup> (Fig. 4). When conservancy income from tourism was removed, the effect was again negative but



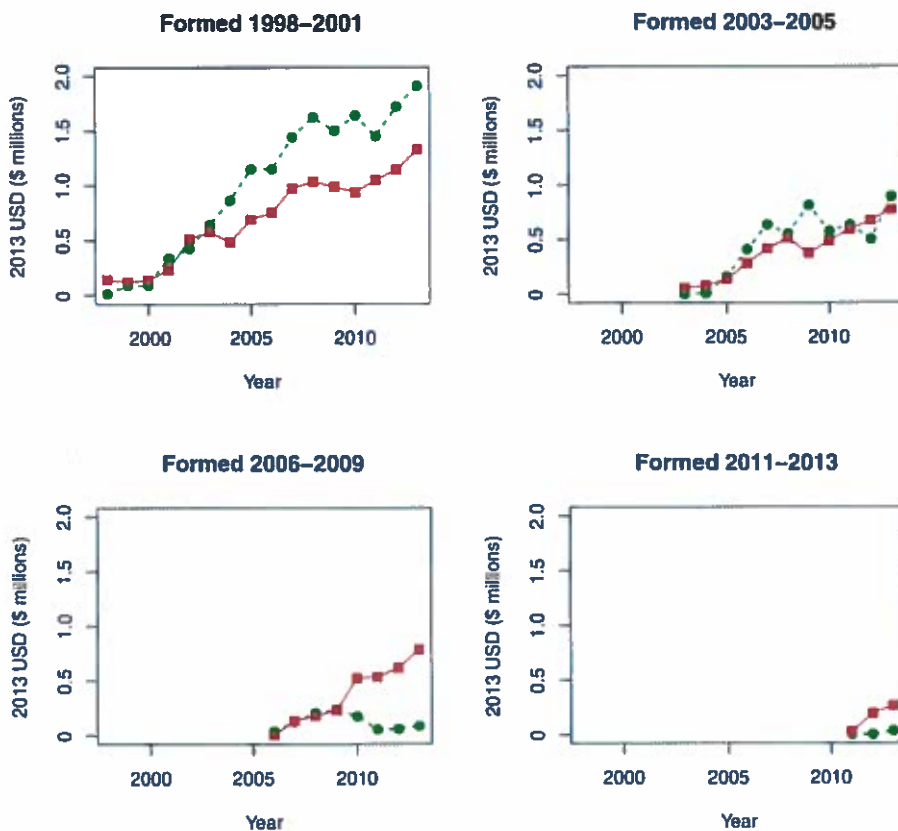


Figure 2. Total benefits from 1998–2013 for hunting (squares) and tourism (circles) across conservancies formed in 4 periods: (a) 1998–2001 ( $n = 15$ ), (b) 2003–2005 ( $n = 29$ ), (c) 2006–2009 ( $n = 15$ ), and (d) 2011–2013 ( $n = 18$ ).

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	<i>t</i>	<i>P</i>
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.

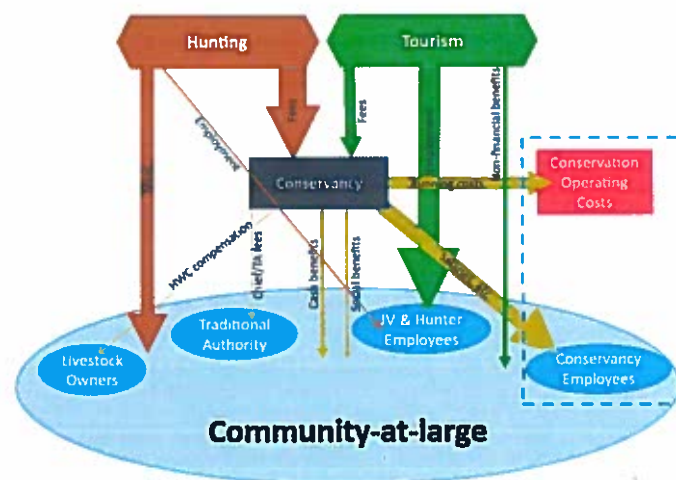


Figure 3. The flow of benefits to various sectors of a stylized local community in Namibia (widths of arrows proportional to dollar values of flows to conservancies from 2011 to 2013; brown, hunting benefit; green, tourism benefit; olive green, flows with a mix of hunting and tourism benefits; dashed 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).

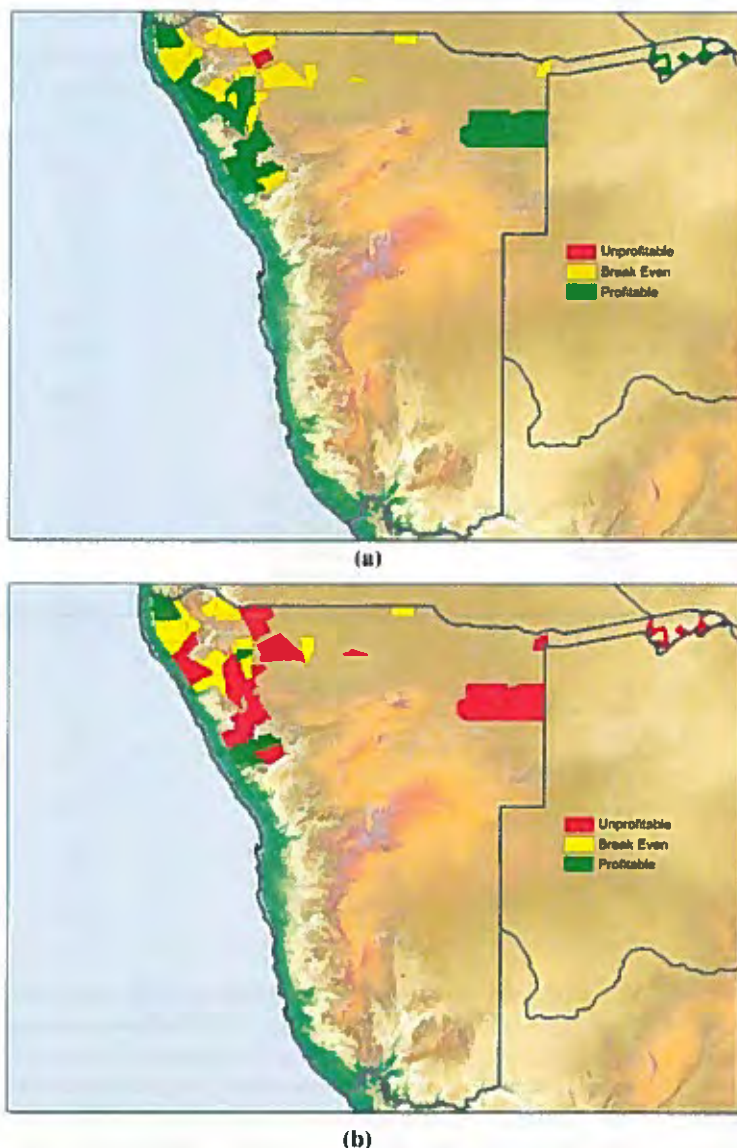


Figure 4. Revenues minus operating costs for 50 communal conservancies for which detailed management cost data were available in 2013 under (a) the status quo and (b) a simulated trophy hunting ban. Break-even conservancies indicate those for which revenues and operating costs are within \$5000 of one 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. 2011b). 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.

<i>Species</i>	<i>Animals bunted</i>	<i>Payment per animal (2013 U.S.\$)</i>	<i>Revenue (2013 U.S.\$)</i>	<i>Percentage of total</i>
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. 2011a; 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. 2013b) 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 dif-

ferences 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' popula-

tions 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. 2011b), evidence on possible negative impacts of trophy hunting on wildlife populations in other parts of Africa (Packer et al. 2010; Lindsey et al. 2013a) 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 (Crosmarty 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 dispute. 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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# Namibia



## ESTIMATED TOTAL ELEPHANTS

**22,754 ± 4,305**

## GUESSES

**90 - 90**

## GENERAL STATISTICS

Country Area	825,418 km <sup>2</sup>
Range Area	164,069 km <sup>2</sup> (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  $\pm$  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<sup>2</sup>, 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  $\pm$  3,580, 9,165  $\pm$  2,016, 14,097  $\pm$  2,678 and 13,116  $\pm$  3,413 (Chase, 2007; Craig & Gibson, 2013b, 2014; Craig, 2011b; Gibson & Craig, 2015a). The previous estimate in the AESR 2007 was 8,725  $\pm$  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#u 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  $\pm$  1,940, 3,638  $\pm$  1,164, and 6,413  $\pm$  2,566 (Craig & Gibson, 2013a; Gibson & Craig, 2015b; MET, 2012). The 2015 figure replaces an estimate of 3,758  $\pm$  2,289 for Khaudum, 61  $\pm$  115 for N#u Jaqna (Kolberg, 2004) and 967  $\pm$  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 Ukwuagali 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).

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  $3,378 \pm 1,756$  and 2,810 (confidence limits not available) (Kolberg, 2012; MET, 2012). The most recent **aerial sample count** from 2015 gave an estimate of  $2,911 \pm 637$  (Kilian, 2015) and replaces an estimate of  $2,057 \pm 598$  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  $314 \pm 154$  (MET, 2012). This replaces an estimate of  $210 \pm 157$  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 Houanib and Houarusib 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 (km <sup>2</sup> )
Aerial Sample Counts	22,754	4,306	—	—	42 %	68,121
Informed Guesses	0	—	90	90	10 %	16,162
<b>Totals 2015</b>	<b>22,754</b>	<b>4,305</b>	<b>90</b>	<b>90</b>		
<b>Totals 2006</b>	<b>15,807</b>	<b>3,276</b>	<b>20</b>	<b>20</b>		
Assessed Range					52 %	84,283
Unassessed Range					48 %	79,786
<b>Total Range</b>					<b>100 %</b>	<b>164,069</b>

## 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 (km <sup>2</sup> )
Repeat Survey	+6,947	±5,410	0	0	50 %	81,727
New Guess	0	0	+70	+70	2 %	2,556
<b>Totals</b>	<b>+6,947</b>	<b>±5,410</b>	<b>+70</b>	<b>+70</b>	<b>52 %</b>	<b>84,283</b>

## AREA OF RANGE COVERED BY EACH DATA CATEGORY

DATA CATEGORY	KNOWN RANGE (km <sup>2</sup> )	POSSIBLE RANGE (km <sup>2</sup> )	TOTAL RANGE (km <sup>2</sup> )
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
<b>Totals</b>	<b>112,471</b>	<b>51,598</b>	<b>164,069</b>

## ELEPHANT ESTIMATES

INPUT ZONE	REASON FOR CHANGE	SURVEY DETAILS			# OF ELEPHANTS		SOURCE	PFS	AREA (km <sup>2</sup> )	MAP LOCATION	
		TYPE	RELIAB.	YEAR	ESTIMATE	95% CI				LONG	LAT
Etosha National Park	RS	AS	B	2015	2,911	637	Kilon, 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		L'Indeque, 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, 2015a	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

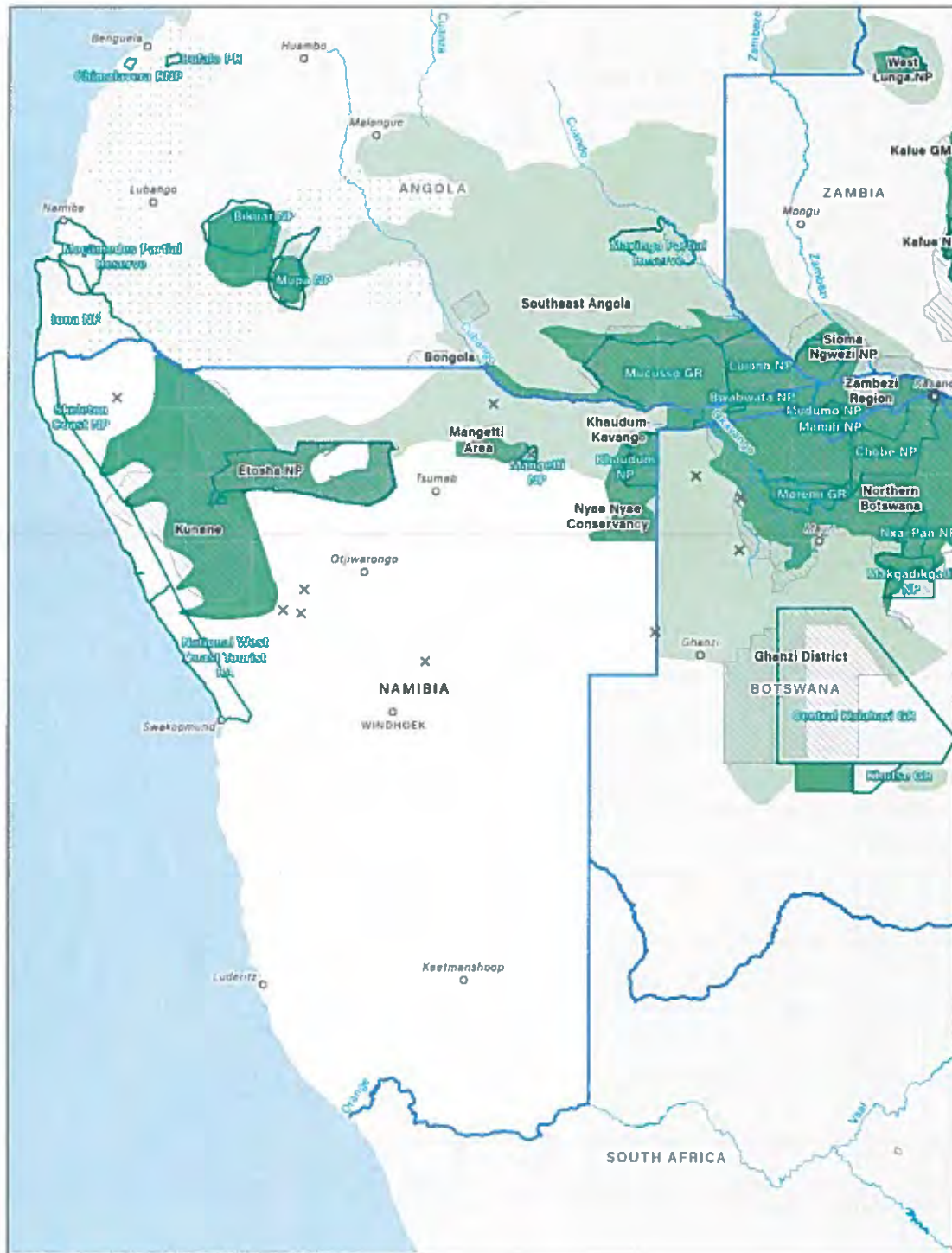
## PFS

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.

## 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).

# Namibia



0 90 180 270 360 450 540 km

## ABBREVIATIONS AND ACRONYMS

See Appendix III for map abbreviations and acronyms



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AFRICAN ELEPHANT STATUS REPORT 2016



- |                   |                       |
|-------------------|-----------------------|
| — Intl Boundaries | <b>ELEPHANT RANGE</b> |
| — Rivers & Lakes  | Known                 |
| • Towns           | Possible              |
| □ Protected Areas | Doubtful              |
| □ Input Zones     | ×                     |
|                   | Sighting              |



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

[officemanager@nacso.org.na](mailto:officemanager@nacso.org.na)[Share / Save](#) [f](#) [t](#) [r](#)[About NACSO](#) [Conservation & Conservancies](#) [News & Media](#) [Calendar](#) [Resources & Publications](#)[Opportunities](#) [Contact us](#) [Search](#) [Log in](#)[Home](#) » [Conservation & conservancies](#) » [Conservancies](#) » [Salambala Conservancy](#) »

## 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 km<sup>2</sup>

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...



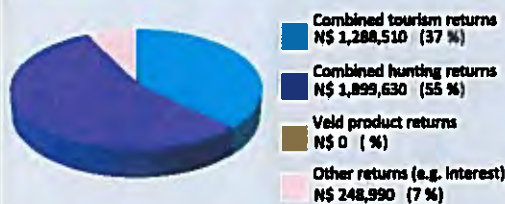
maximising wildlife returns by minimising threats...

## 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

Category	Value (N\$)
Conservancy income	2,006,450

Employment	Private Sector	Staff	Value (N\$)
	52 staff		1,302,080
	Conservancy	37 staff	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



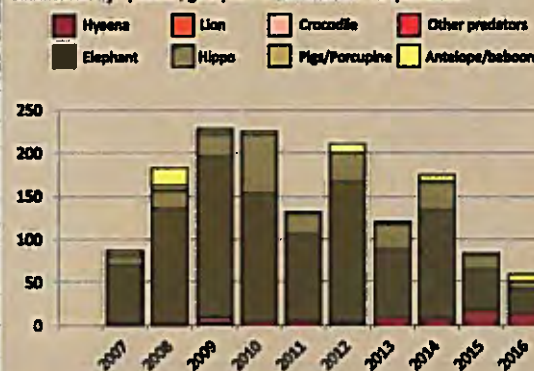
### Management performance in 2016

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 m/ment	
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

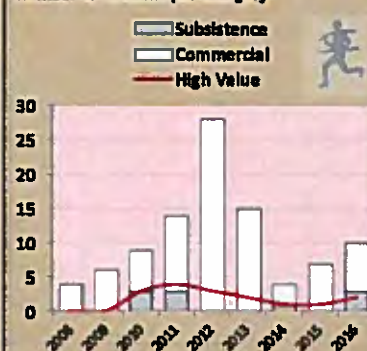
the chart shows the number of incidents per category for the last 3 years; the darkest bar (on the right) indicates the current year for each type



## Poaching

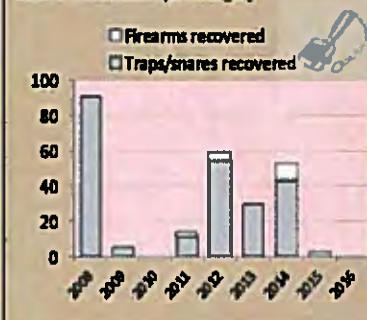
### Number of incidents per year

Commercial poaching is a serious threat to conservancy benefits. The chart shows the number of incidents per category



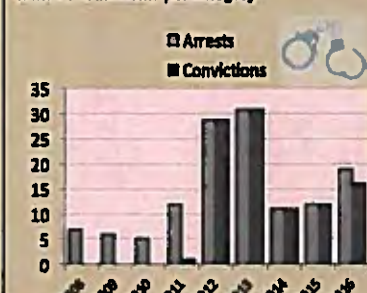
### Traps and firearms recovered

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	Omn 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
Hyena	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				8		
Blue Wildebeest*	11	3	8	2	7				9	3,800	29,800
B. Zebra	40	10	30	8					8	3,500	3,500



## monitoring numbers and trends for a healthy conservancy...

## Current wildlife numbers and status

Species	Animals Seen	Estimate	Wildlife Status		
			Count Trend	National Guideline	Desired Number
B. Zebra	338	360			
Dulker	2	280			
Elephant	57	7			
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.

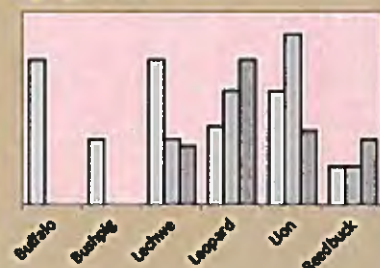
National guideline – gives the species status in the conservancy using national guidelines for the conservancy; for example, lions may cause local problems, but are of high value and are rare at landscape level.

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.

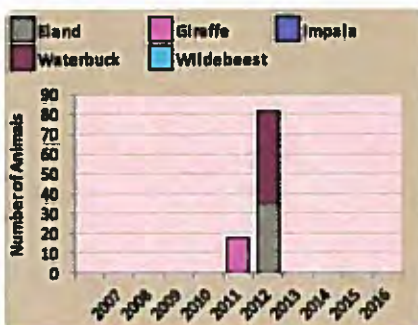
## Locally rare species

Sightings Indicator □ 2014 □ 2015 □ 2016

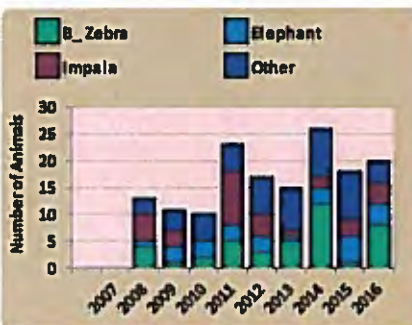


Locally rare and endangered species are not found very often in the conservancy and need special conservation attention.

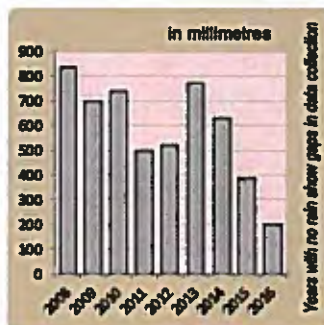
## Wildlife introductions



## Wildlife mortalities

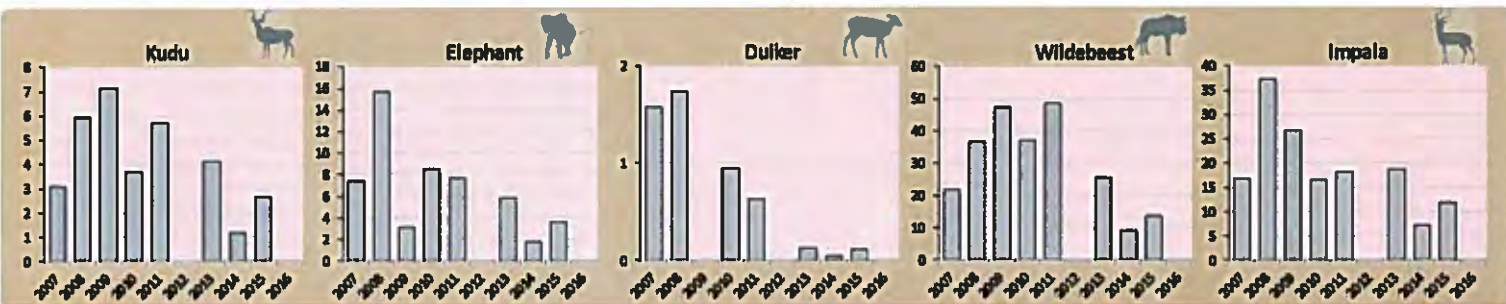


## Annual rainfall



## Fixed route patrols

charts show the number of sightings of each species per fixed route foot patrol each year



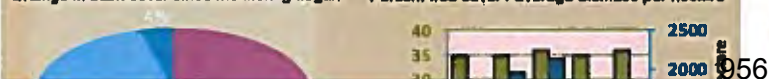
## Predator monitoring

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

Change in bush cover since monitoring began Percent tree cover / average biomass per hectare



## Fire monitoring

Times burned between 2009 and 2016

Fires burned in 2016





# 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 1988
Population (2011 census):	8240
Size (square kilometres):	930

#### 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?	✓

#### Constitutional adherence

Approved constitution	✓
AGM held	✓
Management and utilisation plan	✓
Financial annual report approved at AGM	✓
Financial report external review	✗
Benefit distribution plan	✓



#### 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
Hacala	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.





**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: 1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

Type of Activity

**Import of Sport-hunted Trophies of Southern  
African Leopard and Namibian Southern White  
Rhinoceros**

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 <b>Palmer</b>	1.b. First Name <b>Jeffery</b>	1.c. Middle Name/Initial <b>(b) (6)</b>	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address

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

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

**Section C: All applicants complete address information**

1 a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes) <b>(b) (6)</b>			
1 b. City <b>Mapleton</b>	1 c. State <b>UT</b>	1 d. Zip code/Postal code <b>(b) (6)</b>	1 e. County/Province <b>(b) (6)</b>
1 f. Country <b>USA</b>			
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) <b>(b) (6)</b> Date of signature (mm/dd/yyyy) <b>05/03/2018</b>
<b>Please continue to next page</b>



**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND  
NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit to the address on page one.**

**Note 2:** 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:** *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 4:** Certain hunting trophies, including leopard 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.

- **Complete all questions on the application.**
- **Mark questions that are not applicable with "N/A".**
- **If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.**
- **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)?

Jeffery Palmer

(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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):
- a. Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20.
  - b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia  
Quantity:        (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).

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 ANIMAL HAS ALREADY BEEN TAKEN, please enter the following:

- d. 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: Goreis #122

- e. Date wildlife is to be hunted:

1st Sept to 15th Sept 2016  
(leopard harvested 6th Sept 2016)

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

Okuwira! Hunting Safaris

Owner and PH on hunt: Gideon Cloete

- g. 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]:

Mr. Gideon Cloete

Okuwira Hunting Safaris

P.O. Box 1102

9000 Otjiwarongo, NAMIBIA

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.

- a. 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: Gideon Cloete

Business Name:

Address: PO Box 1102

Address:

City: Otjiwarongo

State/Province:

Country, Postal Code: Namibia

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. 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.

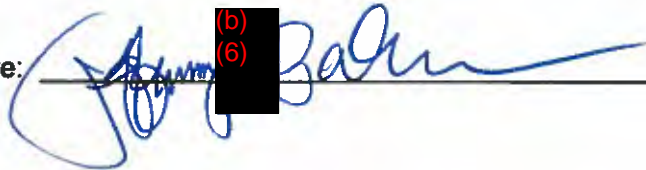
I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). If 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: \_\_\_\_\_

10. 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: 5/3/2018

*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.*

11. 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).

**MINISTRY OF ENVIRONMENT AND TOURISM**

Directorate Scientific Services  
Private Bag 13306  
Windhoek, Namibia  
Enquiries: Chief Warden,  
Permit Office



Tel +264-61-284 2111  
Fax +264-61-258 861

**PERMIT No.:**
**166354**
**VALID FROM:**
**01.09.16**
**VALID TO:**
**15.09.16**
**PERMIT TO HUNT FOR TROPHIES**

Permission is hereby granted in terms of the Nature Conservation Ordinance 1975 (Ord. 4 of 1975)

**Name of Trophy Hunter:**
**J. Palmer**
**Residential Address:**
**USA**
**Country:**

to hunt the specified number of game for the sake of trophies:

**SAS**

Indicates species listed on CITES  
Appendix I or II

	SPECIES: COMMON NAME	Number
	Buffalo	
<b>SAS I</b>	Crocodile	
	Dik-dik	
	Eland	
<b>SAS II</b>	Elephant	
	Giraffe	
	Grey Duiker	
<b>SAS II</b>	Hippopotamus	
	Impala, Black-faced	
	Impala, common	
	Klipspringer	
	Kudu	
<b>SAS II</b>	Lechwe	
	Oryx (Bemsbok)	
	Ostrich	
	Red hartebeest	
	Reedbuck	
<b>SAS I</b>	Rhinoceros, black	
<b>SAS I</b>	Rhinoceros, white	
	Roan	
	Sable	
	Springbok	

	SPECIES: COMMON NAME	Number
	Sleenbok	
	Warthog	
	Waterbuck	
	Wildebeest, blue	
	Zebra, Burchell's	
<b>SAS II</b>	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
<b>SAS I</b>	Cheetah	
<b>SAS I</b>	Leopard (Male)	<b>IX</b>
<b>SAS II</b>	Lion	
	Other	
*Subject to the catcher's permit high hunting conditions. *Please notify the nearest MET office prior to the hunt.		

on the following farms / hunting concessions:

**Malitzelt #230, Prosit #231,  
Gorens Hoo & Burgeweld Hill**

Guided by (name of guides):

**G. P. Locke**

Cashier receipt No.:

**MET/87556**

Issued on

**01.09.16**

Amount received: N\$

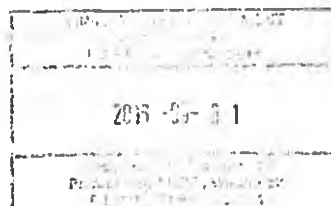
**100.00**

**Attches**

Authorizing officer

**NAPP 138/250  
(2016)**

Official MET date stamp



**IMPORTANT: This permit is not valid if altered in any way.**

prime press 072015



**The following certificate must be completed immediately after each animal that has been hunted (please print)**

[illegible]

\*L= Left, R=Right, H=Horn, B=Base, RW=Rowland Ward

**No trophy hunter may hunt unless accompanied by a professional hunter, master hunting guide or hunting guide.**

**This permit must be kept on the person of the permit-holder at all times while hunting.**

**Only guide(s) as specified on the permit may conduct the hunt.**



**MINISTRY OF ENVIRONMENT AND TOURISM**

Permit Office 2010/03

**Directorate Natural Resource Management**

Private Bag 13306, Windhoek, NAMIBIA

Tel +264 61 2842111 Fax +264 61 258861

---

**PERMIT CONDITIONS**

---

**TROPHY HUNTING OF CHEETHAS, LEOPARDS & LIONS**

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1. A trophy hunter, trophy hunting guide and trophy hunting operator must read and acknowledge and sign the predator trophy hunting permit conditions before the hunt commences.
2. A predator trophy hunting permit must be obtained before the hunt for a predator commences and must be in the physical possession of the trophy hunting guide while the predator is being hunted.
3. The trophy hunting operator concerned must give notice of the predator hunt to the regional office of the Ministry seven days before the hunt commences.
4. A predator trophy hunting permit is
  - a) issued to a trophy hunter;
  - b) non-transferable; and
  - c) valid for a period specified in the permit.
5. Predators may only be hunted for trophies under the following conditions -
  - a) only free roaming, self-sustaining and adult predators may be hunted as trophies with a minimum skull measurement of 27cm for a cheetah, 32cm for a leopard and 52cm for a lion;
  - b) a female leopard may not be hunted as trophy;
  - c) a predator may not be shot in any form of confinement or in a trap or in an area which is smaller than 1000ha;
  - d) a predator may be baited, but a live animal may not be used as bait;

- e) a predator may not be shot within a range of 1km of any other predator kept in captivity in any form;
- f) a predator may be stalked, tracked or ambushed, but dogs or horses may not be used to hunt it;
- g) predator trophy hunting may not take place during the period between 30 minutes after sunset in any day and 30 minutes before sunrise the following day and artificial light is prohibited;
- h) a predator may not be shot from a moving vehicle or chased in any way with an aircraft;
- i) a predator may not be hunted unless it belongs to a wild and sustainable population (It exists as a naturally interacting member of a wild and sustainable population in an area large enough for it to breed, forage and hunt freely and where there is a natural state of balance between forage, predator and prey);
- j) a predator bred in captivity may not be trophy hunted;
- k) a predator to be hunted may not be drugged in any form;
- l) a canned hunting (any restriction of an animal's natural movement for the purpose of trophy hunting) in any form is illegal; and
- m) a predator may only be hunted in areas as specified on the predator trophy hunting permit;
- n) once the predator has been killed, the following must occur –
  - (i) the following photos must be taken immediately after the hunt, at the location where the predator was killed –
    - (aa) the predator lying on its right showing the feet;
    - (bb) the predator lying on its left showing the feet;
    - (cc) a close-up photo from the front showing the face of the predator, clearly depicting facial features: nose, eyes, and mouth, and a visible leopard hunting quota tag number, in case of a leopard;
    - (dd) a close-up photo of the trophy hunter and trophy hunting guide posing with predator, with all four

legs of the predator stretched out for clear visibility of genital feature such as scrotum and visible leopard hunting quota tag number;

- (ii) the trophy hunter and trophy hunting guide must sign all the photos on the reverse side of the photos;
- o) the recording sheet of the predator trophy hunting permit in Schedule G has to be filled in, in permanent ink, immediately after the hunt;
- p) the trophy hunter and trophy hunting guide must sign on the reverse side of the predator trophy hunting permit with the following statement:

*"We hereby individually and collectively declare that the predator recorded and photographed was hunted, shot and killed by us in full accordance with all the predator trophy hunting permit conditions."*

- q) a telephonic report must be given to the staff member responsible for the predator trophy hunting permit register in the Permit Office in Windhoek within 72 hours of the predator being killed, and full details of the predator trophy hunting permit must be provided;
- r) an unsuccessful predator hunt has to be reported to the Permit Office in Windhoek within 72 hours after the trophy hunting permit has expired;
- s) no application for subsequent predator trophy hunting permit from a trophy hunting operator may be processed if the Permit Office has not received the report on the previous permit issued to his or her client (trophy hunter);
- t) the original predator trophy hunting permit with full details as described in paragraph (u) must be handed in to the Taxidermist or shipping agent with the trophy; and

u) an application for an export permit to export a predator trophy must be handed in at the Permit Office in Windhoek and must be accompanied by –

- (i) a copy of the passport of the trophy hunter and of a page thereof with an immigration stamp indicating the date of entry;
- (ii) the original predator trophy hunting permit;
- (iii) the leopard trophy hunting quota tag, in case of a leopard;
- (iv) the recording sheet; and
- (v) the original photos printed on photo paper (glossy paper) referred to in paragraph (n); and
- (vi) export permit may not be issued if the conditions in paragraph (u) have not been met.

6. Condition regarding skin and skull of the hunted predator

- (a) scrotum of the hunted predator must be left attached to the skin to confirm the sex of the animal.
- (b) skin found without an obvious scrotum attached will be treated as female and will not be allowed to be exported.
- (c) skin of the hunted predator must be brought to MET office (CITES Office) for tagging and inspection before the export permit can be issued.
- (d) skull of the hunted predator must be brought to MET office (CITES Office) for SCI measurements before the export permit can be issued

7. *Leopard trophy hunting quota tag is not transferable.*

*Any contravention or non compliance with any regulation or permit condition is dealt with in accordance with the Nature Conservation Ordinance, 1975 (Ordinance No. 4 of 1975), especially sections 84(5), 86, 87, 88 and 89.*

I hereby acknowledge that I have read and understand the predator trophy hunting permit conditions:

Signatures:

Trophy Hunter:

Date: 05-09-2016

Trophy Hunting Guide:

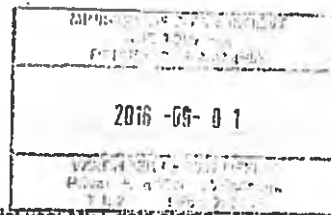
Date: 05-09-2016

Trophy Hunting Operator:

Date: 05-09-2016

Permit Number:

166354





# SCHEDULE G

## RECORD SHEET (Regulation 114C (o))

### Schedule G – RECORD SHEET (Regulation 114C (o))

SPECIES HUNTED LEOPARD

HUNT PERMIT NUMBER 166 354 CLIENT NAME J (b) (6) PALMER

PROFESSIONAL HUNTER GIDEON GOETE HUNTING OUTFITTER OKUYIRA SAMPALI

HUNTING BLOCK/PROPERTY NAME GOREIS #122 CONCESSION HOLDER/LANDOWNER [Signature]

HUNT START DATE 02-09-2016 HUNT FINISH DATE 06-09-2016

1. WAS THE HUNT SUCCESSFUL? YES ☒ NO ☐

IF NO, WHY NOT?  
\_\_\_\_\_

2. HUNTING METHOD (tick appropriate box): I) BAIT AND BLIND ☒ II) ON FOOT ☐

3. PRE-BAITING: YES ☒ NO ☐

4. NUMBER OF BAIT SITES USED DURING HUNT (including pre-baiting if applicable): 2

5. NUMBER OF BAIT SITES FED ON BY PREDATOR (including pre-baiting if applicable): 1

6. TOTAL NUMBER OF BAIT NIGHTS (including pre-baiting if applicable):  
The total number of nights that all bait sites were open (if 6 bait sites were open for 1 night = 6 bait nights) 8

7. TOTAL NUMBER OF BAITS USED (including pre-baiting if applicable):  
The total number of times that bait sites were 'freshened' with new bait 12

8.

SEX & AGE OF PREDATOR FEEDING ON BAITS DURING HUNT:	NUMBER:	EVIDENCE (SIGHTING, TRACKS, TRAIL CAMERA):
Adult male	<u>1</u>	<u>TRACKS</u>
Adult female	<u>1</u>	<u>TRACKS / TRAIL CAMERA</u>
Subadult male		
Subadult female	<u>1</u>	<u>TRACKS / TRAIL CAMERA</u>
Juvenile	<u>1</u>	<u>TRACKS / TRAIL CAMERA</u>
Unknown		

9. NUMBER OF PREDATOR SEEN MORE THAN 1 KM AWAY FROM BAITS: 2 MALES  
1 FEMALE

IF TROPHY WAS TAKEN:

10. DATE TROPHY TAKEN: 05-09-2016

11. GPS LOCATION (n decimal degrees):

2012" S 15° 46' 25" E

12. CONDITION OF PREDATOR (tick all appropriate boxes):

i) HEALTHY ☐

ii) UNHEALTHY ☐

iii) FULL STOMACH ☐

iv) MEDIUM STOMACH ☒

v) EMPTY STOMACH ☐

MEASUREMENTS:

13. BODY LENGTH (CM):

220 cm

14. SHOULDER HEIGHT (CM):

62 cm

15. NECK CIRCUMFERENCE (CM):

55 cm

16. SKULL LENGTH (MM):

241.5 cm

17. SKULL WIDTH (MM):

15 cm

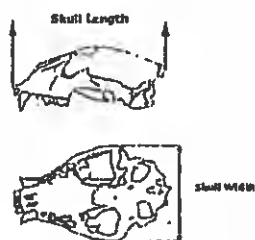
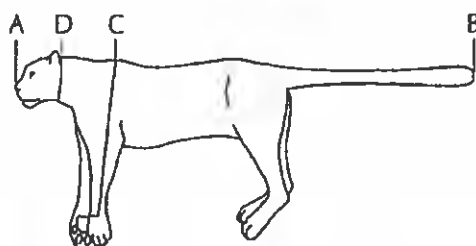
18. WEIGHT (KG)

69

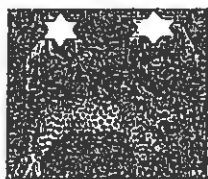
MEASUREMENTS & PHOTOGRAPHS

Measurements to be taken:

11. Body length (cm, tip of nose to tip of tail; Measurement A-B)
12. Shoulder height (cm, tip of scapula to back of plantar pad; Measurement C)
13. Neck circumference (cm, immediately behind the ear; Measurement D)
14. Skull length (mm, greatest length of skull, measured as a straight line between pegs)
15. Skull width (mm, greatest width of skull, measured across zygomatic arches)



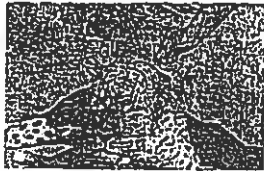
Photographs required before the trophy is skinned:



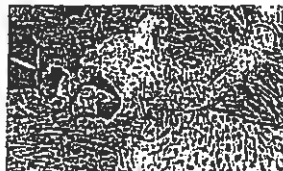
1. Side view showing the entire body with the hunter positioned directly behind for scale, and visible predator hunting quota tag number.

2. The predator lying on its right showing the feet and visible predator hunting quota tag number.

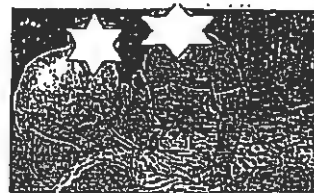
3. The predator lying on its left showing the feet and visible predator hunting quota tag number.



4. Close up of the nose clearly showing the nose, eyes, and mount and a visible predator hunting quota tag number.



5. Frontal view of the teeth showing coloration and wear on the canines and incisors and visible predator hunting quota tag number..



6. Hindquarters clearly showing the scrotum and visible predator hunting quota tag number.

**Photographs required from the cleaned skull:**



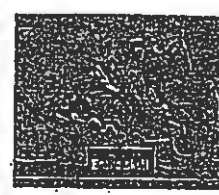
7. Lower jaw showing all the teeth and chipping of the enamel ridge on the back of the canines.



8. Upper jaw showing all the teeth and chipping of the enamel ridge on the back of the canines.



9: Side view of the lower jaw (either side) showing the canine and wear on the cusps of molars and premolars.



10. Wide shot of all the teeth showing wear, broken teeth, and teeth coloration.

SIGNATURE OF.

Trophy hunter:

(b)  
(6) [Signature]

Date:

05/09/2016

Trophy hunting Guide:

[Signature]

Date:

05-09-2016

Trophy hunting Operator:

[Signature]

Date:

05-09-2016



## *Okuwira! Hunting Safaris*

Gideon Cloete  
Professional Hunter  
okuwirasafaris@gmail.com  
081 285 7104  
P.O.Box 1102 Otjiwarongo  
Namibia

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5 September 2016

Ministry of Environment and Tourism

P/Bag 13306

Windhoek

Namibia

**RE: Leopard photos taken in twilight – Client Jeff Palmer Permit nr 166354 Tag nr: NAPP128/2502016**

I, Gideon Cloete, owner of Okuwira! Hunting Safaris do hereby want to explain why my leopard photos with client Jeff Palmer was taken in the evening.

The leopard was hunted in September 2016, by client J. [REDACTED] Palmer, permit nr 166354 on tag NAPP128/2502016.

Mr Palmer booked a leopard hunt in mid June 2016 for 14 days with Okuwira! Hunting Safaris and in this time we had no luck in getting a leopard. Mr Palmer rebooked the tag in September 2016.

We had 2 males on bait, but weather conditions made it difficult for us to keep the leopards on baits and to shoot a leopard in legal shooting hour.

Mr Palmer had to leave for USA in the middle of the hunt due to personal reasons. On our way to the airport on the 5<sup>th</sup> of September a farmer contacted us, where we had baits out and hunted and said that his cattle guard contacted him and said that a leopard caught one of his new born calves. I quickly discussed it with Mr Palmer and we had to decide on whether to go wait for the leopard, otherwise the farmer would kill the leopard with a trap or poison.

We decided to go have a look at where the leopard caught the calf and could see that the leopard was a male. The leopard caught the new born calf and dragged it into heavy thick



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Gideon Cloete  
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081 285 7104  
P.O Box 1102 Otjiwarongo  
Namibia

---

cover. I told Mr Palmer we should go get our blind and accessories to set up and then wait for the leopard.

It took us an hour to get the blind and accessories and return to where the calf was caught. In the meantime the leopard returned and dragged the calf further away from where we originally found it.

As the road was far from the place we had to setup, we only took what we needed for the setup. My thoughts were that the leopard would return soon, because it returned just after we found the calf the first time. We were set up by 14h30.

When the sun started to go down, I told Mr Palmer that I don't hope that we disturbed the leopard, because leopards on commercial farmlands are very sensitive due to farmers killing them on sight with poison or snares making the leopards clever and hard to hunt. Due to this fact the leopards get totally nocturnal and difficult to hunt.

I know it was just after sun set that I told Mr Palmer that we only have plus minus 20 minutes of legal shooting light left when I saw the movement through my opening in the blind. I could see the leopard returned.

Mr Palmer made a quick shot on the leopard and I could see the leopard was shot but ran into thicker cover to the back.

As a Professional Hunter of profession my rule is always to wait 20-30 minutes after the shot was fired before doing a follow up. By that time it was dark and I radioed my trackers to come, but due to the thick bush conditions the vehicle couldn't come close.

When the trackers arrived with better lighting, we could see a heavy blood trail. After a slow search we finally found the leopard dead.

I took all the necessary photos to give the true print of the leopard for my permit and tag and by that time it was dark.

I could not leave the leopard until sunrise due to other predators in the area like hyena and jackal. They would have destroyed the skin.

Due to safety reasons for the trackers, myself and Mr Palmer, I waited at least 20-30 minutes before I did the follow up on the leopard.



## *Okuwira! Hunting Safaris*

Gideon Cloete  
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081 285 7104  
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Namibia

---


Due to these facts as mentioned and the commercial farmers killing leopards on sight, poisoning them or getting leopards in snares it makes leopard hunting more difficult for hunters, because it causes the leopard to become very sensitive and extremely nocturnal.

We as outfitters can only hope to get a leopard for a client available to shoot in legal shooting hours.

With this explanation I confirm that we shot and killed a leopard in full accordance with the predator trophy hunting conditions.

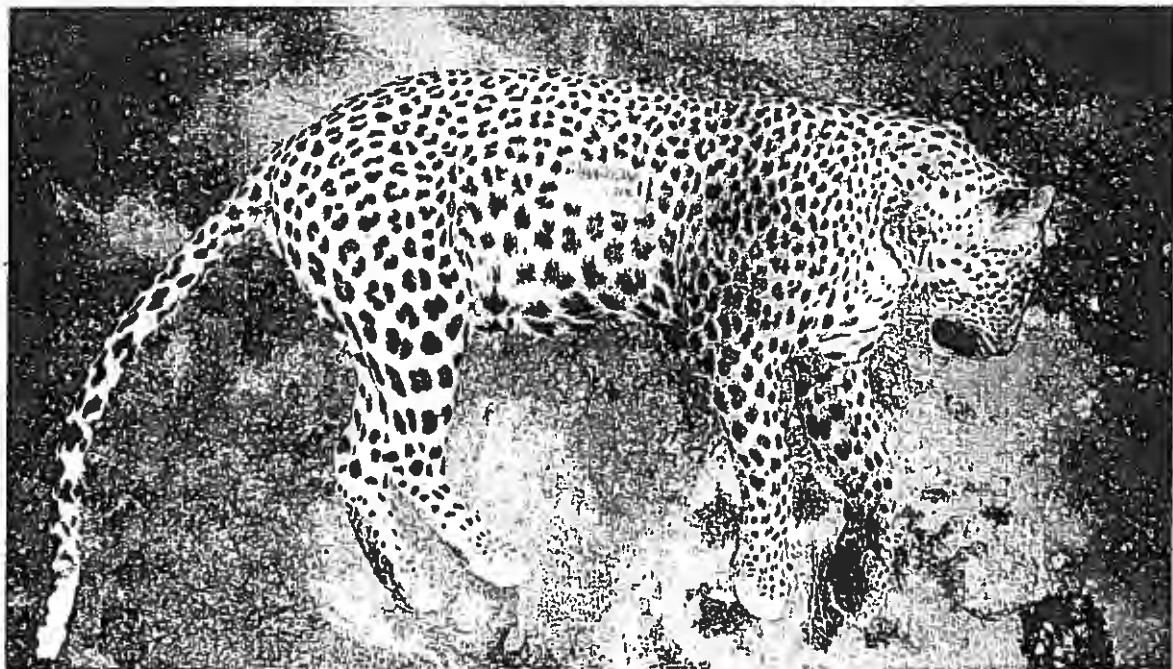
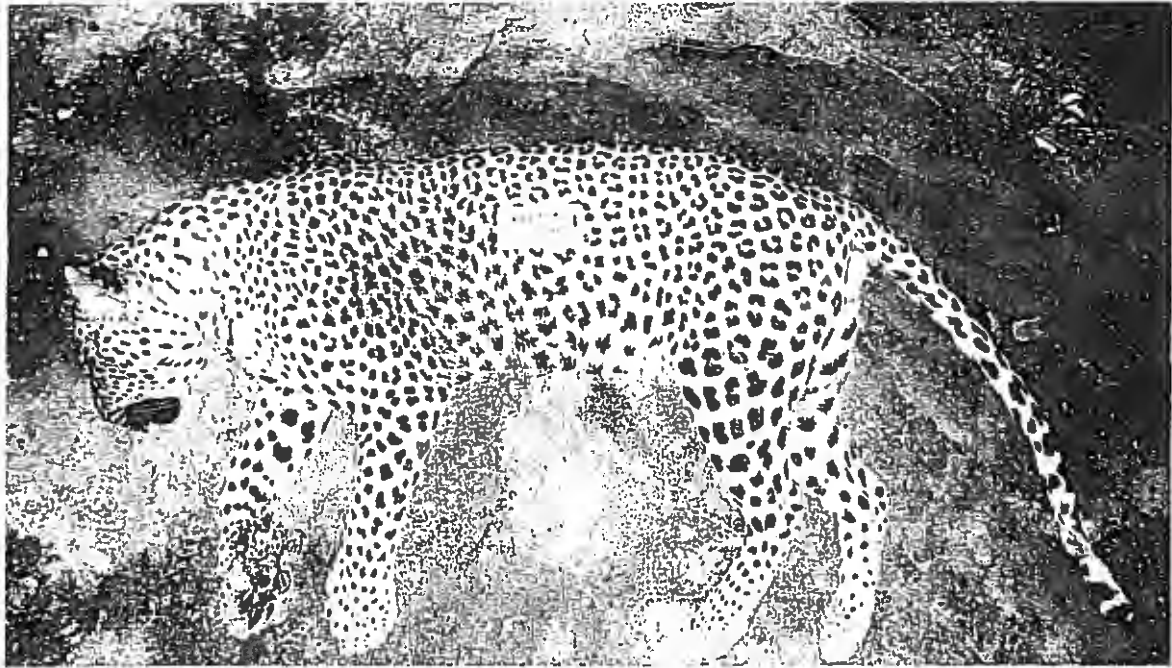
For any further information, please don't hesitate to contact me.

Yours sincerely

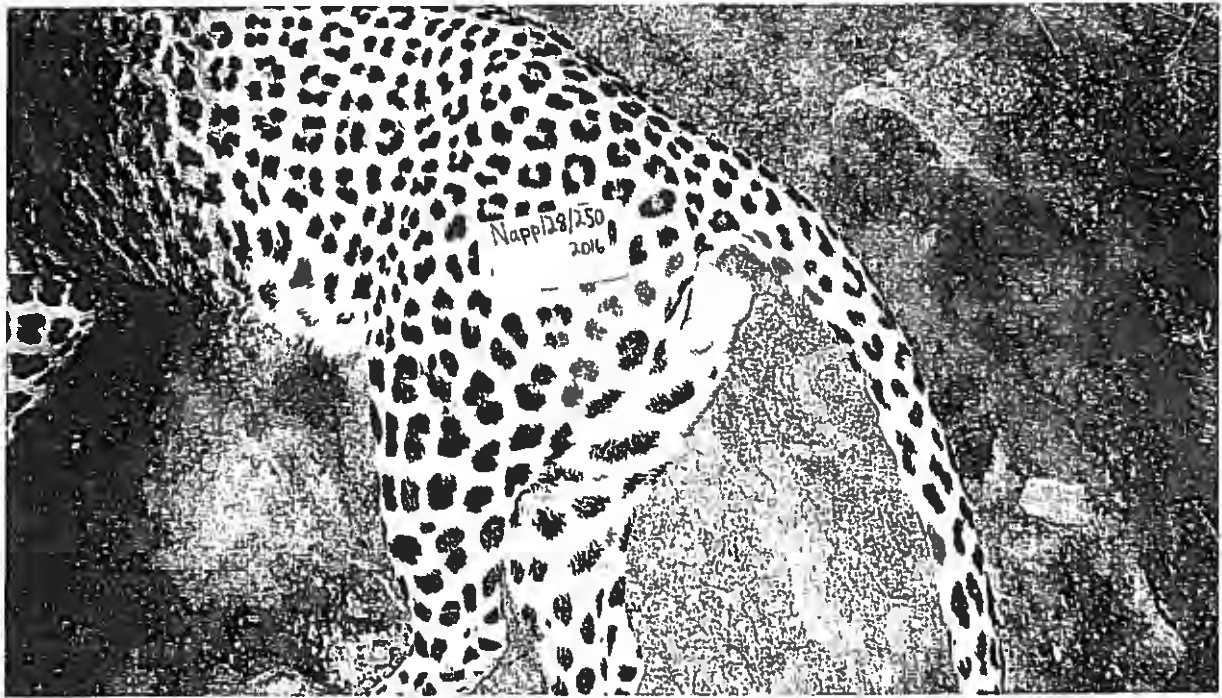
 05/09/2016  
Gideon Cloete





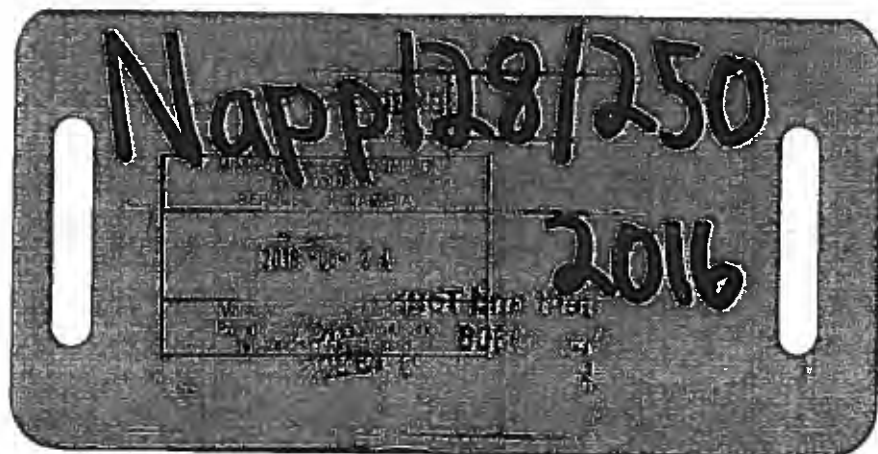
















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Fax: +264 (0)61 304029  
Email: info@yellow-shark.com

The Yellow Shark Holdings (Pty) Ltd.

P.O. Box 81413 - Windhoek  
Windmill Park Unit 7, Dante Street  
Prosperita, Windhoek  
Republic of Namibia

## SPEDITIONS AUFTRAG / FORWARDING & SHIPPING CONTRACT

### CONSIGNEE & ADDRESS OF DESTINATION

MR. JEFFERY PALMER

MAPLETON, UTAH  
UNITED STATES

Tel.1 +1 801 369 2826

Fax:

Tel.2 eMail palmer@rimports.com

### Consignor & Address of ORIGIN

MR. GIDEON CLOETE

OKUWIRA HUNTING SAFARIS  
P.O. BOX 1102  
9000 OTJIWARONGO  
NAMIBIA

Tel.1 +264 67 303901

Fax:

Tel.2 +264 81 285 7104 eMail okuwirasafaris@gmail.com

Contract Number 18171

Windhoek, 14 Oct 2017

POS	Description	Skull	Horns	Cape	Skin	Tail	Sh.-mount	Tusks (sets)	Other	Other Details
1	Leopard (Panthera pardus)								2	FLOATING BONES
2	Leopard (Panthera pardus)	1							1	FULL MOUNT SKIN
3	Leopard (Panthera pardus)								1	FULL MOUNT STAND
4	Leopard (Panthera pardus)								1	JAW
5	Zebra (Equus hartmannae)				1					TANNED
TOTAL No. of Items										7

EP	VET	INVOICE	Payment Type:				
CP	F178	DOCS	Insurance :				
SPECIAL INSTRUCTIONS							
KINGS ORDER #1290/1							
DIMS:							
200 X 173 X 100 = 259 KG							
Hunt. Permit:				SIGNATURE (CONSIGNOR)			
				166354	No. of PCS	Act. WEIGHT	Vol. WEIGHT
				166271			
				Dimensions			

We are acting as agents only and do not accept liability for actions, errors and omissions on the part of carriers or third parties who are governed by their respective rules, regulations and conditions



Republic of Namibia

## MINISTRY OF ENVIRONMENT AND TOURISM

Tel: +264-61-284 2111  
Fax: +264-61-259101  
E-mail: [info.filemon@met.gov.na](mailto:info.filemon@met.gov.na); [josefina.shapi@met.gov.na](mailto:josefina.shapi@met.gov.na)

Directorate Scientific Services  
CITES Management Section  
Private Bag 13306  
WINDHOEK  
Namibia

 Management Authority of Namibia

### EXPORT CONFIRMATION CERTIFICATE

THE MINISTRY OF ENVIRONMENT AND TOURISM IS THE CITES MANAGEMENT AND SCIENTIFIC AUTHORITY AND AS SUCH CERTIFIES THAT:

IMPORTER	EXPORTER
Jeffery [REDACTED] Palmer [REDACTED] [REDACTED] Mapleton. Utah United States	Gideon Cloete P O Box 1102 Otjiwarongo Namibia

- A) Obtained the following samples, in accordance with the Namibian National Legislation on 05/09/2016 with hunting permit number 166354
- B) The export of this specimen(s) is not detrimental to the survival of the Namibian Leopard population.

TYPE OF TROPHY
2x Floating Bones & fullmount

The trophy is marked with the following tag number: NAPP 128/250 (2016)

IN ACCORDANCE WITH ARTICLE III OF THE CITES CONVENTION, AN EXPORT PERMIT WILL BE ISSUED UPON RECEIPT OF AN IMPORT PERMIT FROM THE COUNTRY OF DESTINATION.

  
Licensing official







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

MAY 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)

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 Schumacher	1.b. First name Randolph	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	
5. Affiliation/ Doing business as (see instructions)			
6.a. Telephone number (b) (6)	6.b. Alternate telephone number	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 Colorado Springs	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 <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify (b) (6) 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 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 and that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant responsible for permit (No photocopied or stamped signatures) _____ Date of signature (mm/dd/yyyy) 04/26/2018	

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.  
Loxodonta africana, African Elephant
  - 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):  
Namibia, Mashi Conservancy Closest City: Katima Mulilo
  - b. Date wildlife was hunted:  
October 1st 2017

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

Tusks, skin, feet, ears

- 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]:

Omujeve Safaris, Ongombo West Section 2, Number 56, Windhoek Namibia

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: Gideon Cloete  
Business Name: Omujeve Safaris  
Address: Ongombo West Section 2,  
Address: Number 56  
City: Winhoek  
State/Province:  
Country, Postal Code: Namibia

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 (b) (6)**). 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: 4/26/2018

*Be aware that there may be additional permit and approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your proposed 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):  
Randy Schumacher, (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.



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

May 3, 2018

**BOARD OF DIRECTORS:**  
JOHN J. JACKSON, III, J.D.  
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U.S. Fish and Wildlife Service  
Division of Management Authority  
Branch of Permits, MS: IA  
5275 Leesburg Pike  
Falls Church, Virginia 22041

Re: Applications for Permits to Import Sport-Hunted Elephant Trophies

Dear Chief Cogliano:

Enclosed please find two applications for permits to import sport-hunted trophies.

- The first applicant is hunting an elephant in the Salambala conservancy in Namibia. The funds from this hunt will be used to support conservancy operations and ensure the land remains beneficial habitat for Namibia's growing elephant population. The meat will be distributed to the conservancy's over 8,500 residents. Please consider the enclosed information and information in the DMA's files regarding the benefits of elephant hunting in Namibia, including information previously submitted by Conservation Force and Namibia's Ministry of Environment and Tourism, in making a positive enhancement finding for this applicant.
- The second applicant is hunting an elephant in the Divindu concession in Namibia. Again, the funds from this hunt are used to benefit Namibia's communities and the meat will be distributed. These incentives have sustained positive elephant population growth and reduced poaching and human-elephant conflict in Namibia. Please consider the information in the DMA's files and the information here and that will be submitted by this operator, as well as information received from Conservation Force and Namibian authorities, 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

### 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 ELEPHANT 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: Donald Robillard

Name: DONALD ROBILLARD

Date: 04/23/2018



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 Robillard	1.b. First name Donald	1.c. Middle name or initial (b) (6)	1.d. Suffix (b) (6)
2. Date of birth (mm/dd/yyyy) (b) (6)	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	
3.a. Principal officer Last name	3.b. Principal officer First name	3.c. Principal officer Middle name/initial	3.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 Dallas	1.c. State Texas	1.d. Zip code/Postal code (b) (6)	1.e. County/Province	1.f. Country USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – <b>attach documentation of fee exempt status as outlined in instructions.</b> (50 CFR 13.11(d))	
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in <i>Title 50, Part 13 of the Code of Federal Regulations</i> and the other <i>applicable parts in subchapter B of Chapter I of Title 50</i> , and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div>           Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures)  </div> <div>           Date of signature (mm/dd/yyyy)            04/23/2018         </div> </div>	

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.

NA

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

Donald Robillard (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.

NA

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Lexodonta Africana (African Elephant)

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:

Rep of Namibia: Kavango East, Beabwata West; S18 09 162 E021 42 495; Divundu

b. Date wildlife is to be hunted: June 8 to June 30, 2018

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

Hunt Africa Namibia CC; Jacobus Hugo Pinaar

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).

PERMITS WILL BE ISSUED  
PRIOR TO HUNT. NOT YET  
ISSUED AT DATE OF APPLICATION.

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:

Jacobus Hugo Pinaar, Hunt Africa Namibia CC

City:

State/Province:

PO BOX 1100, GOBABIS, OMAHEKE, NAMIBIA

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?

Population of elephant in this area (October 2017) more than 2000 and increasing.

COUNTRY POPULATION APPROX. 26,000.

- 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 Daily Fees US\$43,757. Trophy Fee US\$70478. 40% of trophy fees go to the Namibia government-Game Products Trust Fund (repairs, maintenance, salaries of rangers in areas where elephants roam. 40% to the community. The community uses the money to pay game rangers and for support of the KWE people.

- 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?

Safari company has agents that are paid for anti-poaching information. The Professional Hunter, Jacobus Pinaar, is a trustee on the HUAP Trust (Hunters United Against Poaching). HUAP Trust has raised over N\$4million to fight elephant poaching.

NOTE: INFORMATION FOR QUESTION 9 PROVIDED BY HUNT AFRICA NAMIBIA CC.

**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 U.S. States, cannot be re-exported.

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.*

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).





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)

RECEIVED 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 <b>McGinnis</b>	1.b. First name <b>Michael</b>	1.c. Middle name or initial <b>(b) (6)</b>	1.d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Social Security No. <b>(b) (6)</b>	4. Occupation <b>(b) (6)</b>	
5. Anticipation/Doing business as (see instructions)			
6.a. Telephone number <b>(b) (6)</b>	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		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>(b) (6)</b>			
1.b. City <b>Lynchburg</b>	1.c. State <b>VA</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. Country/Province <b>USA</b>
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. Country/Province
2.f. Country			

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  <b>[Signature]</b> Signature (in blue ink) of applicant/person responsible for permit. (No photocopied or stamped signatures)  <b>3/28/18</b> Date (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, 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, MASHONLAND WEST, RIFA SAFARI AREA, HURUNWE  
CHIRUNDU (S1611932E029)*

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 # 0011 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 McGinnis  
(b) (6)

(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.



## United States Department of the Interior



### FISH AND WILDLIFE SERVICE

International Affairs

5275 Leesburg Pike, MS: 1A


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 Buby Valley Conservancy (BVC) alone during 2015 (K. Leatham, 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 loss 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 (ZPMWA 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 (ZPMWA 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 (ZPMWA 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 ZPMWA (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<sup>2</sup> of land where some form of wildlife based land use is practiced in Zimbabwe. Lions occur permanently in 45% of this available range (c. 145,000km<sup>2</sup>), 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<sup>2</sup> 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<sup>2</sup> 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 Bulyebe) 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<sup>2</sup> 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 13<sup>th</sup> 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<sup>2</sup> 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  $0.3 \pm 0.1/100 \text{ km}^2$  for female lions; during the same period, actual offtake was lower at  $0.08 \pm 0.1/100 \text{ km}^2$ , 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 to ZPWMA'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<sup>2</sup>; the 2015 offtake would have accounted for 0.125 lions/1,000 km<sup>2</sup>.

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): 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 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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# 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) McGinnis (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 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 Zimbabwe.

#### 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 Bvumba Valley Conservancy (BVC) alone during 2015 (K. Leatham, 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 loss 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<sup>2</sup> of land where some form of wildlife based land use is practiced in Zimbabwe. Lions occur permanently in 45% of this available range (c. 145,000km<sup>2</sup>), 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<sup>2</sup> 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<sup>2</sup> 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 Bulyana) 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<sup>2</sup> 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 13<sup>th</sup> 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<sup>2</sup> 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  $0.3 \pm 0.1/100 \text{ km}^2$  for female lions; during the same period, actual offtake was lower at  $0.08 \pm 0.1/100 \text{ km}^2$ , 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 ZPWMA'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<sup>2</sup>; the 2015 offtake would have accounted for 0.125 lions/1,000 km<sup>2</sup>.

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 (b) (6) McGinnis, (b) (6) Lyndhurst, Virginia.

 6/8/18  
Anna Barry, Acting Team Leader  
Branch of Permits  
Division of Management Authority

 6/8/2018  
Mary Coglian, Chief  
Branch of Permits  
Division of Management Authority

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**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 Cogliano*  
CHIEF, BRANCH OF PERMITS, DMA

**Permittee:**

MICHAEL (b) (6) MCGINNIS (b) (6)  
(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).



RCVD MAY 24 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 OF BONTEBOK  
TROPHIES FROM SOUTH AFRICA**

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 <b>Bennett</b>	1.b. First Name <b>Roger</b>	1.c. Middle Name/Initial <b>(b) (6)</b>	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number <b>(b) (6)</b>	3.a. Alternate Telephone Number <b>N/A</b>	3.b. E-mail address <b>(b) (6)</b>



**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>(b) (6)</b>			
State <b>TN</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province <b>(b) (6)</b>	1.f. Country <b>USA</b>
2.a. Mailing address (include if different than physical address, include name of contact person if applicable) <b>Molex Group LLC Attn: Allison Phillips 1114 US HWY 31 South, Suite D</b>			
2.b. City <b>Athens</b>	2.c. State <b>AL</b>	2.d. Zip code/Postal code <b>35611</b>	2.e. County/Province <b>Limestone</b>
			2.f. Country <b>USA</b>

**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>05/15/2018</b>	
Please continue to next page	

**IMPORT OF SPORT-HUNTED BONTBOK TROPHIES from South Africa**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** The bontbok is listed as endangered under the Endangered Species Act. Applications for endangered species permits must be published in the Federal Register for a 30-day public comment period. Allow at least 90 days for the application to be processed.

**Note 4:** This application can only be used if you have hunted/will be hunting in **South Africa**. If you have or will be hunting in a different country, please use form [3-200-20](#)

**Note 5:** *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:
  - 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;
  - 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
  - The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

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)?  
Allison Phillips PH: 256-233-5905 EMAIL: [aphillips@molexcompany.com](mailto:aphillips@molexcompany.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. How many Bontebok (*Damaliscus pygargus pygargus*) are you applying to import? Quantity: 1

- a. At the time of the application, the specimen(s) is:

Alive

☒ Dead

- b. What is the approximate date of proposed take? 11/09/2016

- c. What is the date you took the animal? 11/10/2016

- 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]:

5. ENTER the name and address of the landowner on whose property the bontebok was or will be taken:

Owners name: Cedric Roberts  
Farm Name: Viljoenshof  
District: Lejweleputswa  
Address: Box 203  
City: Hoopstad, Boshof  
State/Province: Free State of Province  
Country, Postal Code: South Africa, 9479

Please be aware that the bontebok is listed in Appendix II of CITES. As such, you must obtain a CITES export permit from South Africa. If you are not exporting the trophy from South Africa directly to the United States, you will need to obtain a CITES Re-export certificate from the re-exporting country.

6. Attach a signed statement from the landowner giving you permission to cull a bontebok from their captive herd.
7. If available, provide a copy of the landowner's Certification of Registration for the bontebok herd. (Note: this is not a copy of the export permit or certificate issued by a South African province.) In order to meet the criteria for a permit under the Endangered Species Act, the bontebok must be culled from a ranch that has been certified by the Government of South Africa under their bontebok program. If the ranch is not registered, we may be unable to issue an import permit.

8. **Complete name and address** of overseas person or business shipping the trophy to you (this name will appear on the face of the permit).

Name: Katharina Hecker  
Business Name: Nico Van Rooyen Taxidermy  
Address: A1 De Waal Street  
Address:  
City: Rosslyn, Pretoria  
State/Province: Gauteng  
Country, Postal Code: South Africa, 0200

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. **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**).

Taxidermist/Broker's signature: \_\_\_\_\_ Date: \_\_\_\_\_

10. **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**).

Applicant's signature: Rogers  Remmets Date: 05/15/2018

*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 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).

# The department of economic development, tourism and environmental affairs



**the de tea**  
The Department of Economic Development, Tourism and Environmental Affairs  
FREE STATE PROVINCE

98 Zastron Street  
Agriculture Building  
Third Floor  
Bloemfontein  
9300  
Free State  
South Africa

Permit Office  
Private Bag X 20801  
Bloemfontein  
9300  
Tel 051 400 9527/26  
Fax 051 400 9523



## Permittee Details

6204265032088

Cedric Roberts

Maize Flats

Hoopstad

9479

Box 203

Tel

Fax

africasbest@vodamail.co.za

Cell 082 577 9347

This Permit is issued in terms of the Biodiversity Act 10 of 2004 (Threatened or Protected Species Regulations) and In Terms of Nature Conservation Ordinance no 8 of 1969, permission is hereby granted to the holder of this permit to;

## General Permit

To hunt 30/Thirty Black Wildebeest (*Connochaetes gnou*), 05/Five Common Reedbuck (*Redunca arundinum*), 05/Five Bontebok (*Damaliscus pygargus pygargus*), 05/Five Tsessebe (*Damaliscus lunatus*), 04/Four Roan (*Hippotragus equinus equinus*) on the farm Maize Flats, Hoopstad.

Permittee's Signature

Approved on behalf of the MEC department of economic development, tourism and environmental affairs

Expiry Date

2016-12-31

Permit Number

01/32188

Date Issued

2016-03-18

Return Permit After Expiry Date

Cynthia Seqhobane

# TOESTEMMING

## OM TE JAG en VLEIS TE VERVOER

DATUM: ..... 10 / Nov 2016 .....

NAAM & ADRES VAN EIENAAR: **CEDRIC ROBERTS**  
 ID: 620426 5032 08 8 **POSBUS 203**  
 TEL: 053 4331113 **MAIZE FLATS**  
 SEL: 082 577 93 47 **HOOPSTAD 9479**

Hiermee gee ek **CEDRIC ROBERTS**  
 van die plaas **VILJOENSHOF, BOSHOF**  
 VRYSTELLINGSNO: HK/P26/05364/001 toestemming  
 aan:

NAAM & ADRES VAN JAGTER:

ROGER (b) (6) BENNETT  
 (b) (6)  
 LYNN HAVEN, FLORIDA  
 (b) (6) U.S.A.

PASSPORT # (b) (6)  
 ID NO: (b) (6)

TEL NO:  
 SEL NO:

S A JAGTERS LIDNO: ..... N/A .....  
 VOERTUIG REGISTRASIE: ..... N/A .....

Om op bogenoemde plaas vanaf 09 Nov 2016  
 (datum)  
 tot 10 Nov 2016. (datum) te jag en die vleis na  
 bogenoemde adres te vervoer.

Die volgende diere is gejag en mag vervoer word:

AANTAL	SPESIE	GESLAG
1. 1 (ONE)	Bontebok	M
2. 1 (ONE)	Tsessebe	M
3. ....	.....	.....
4. ....	.....	.....
5. ....	.....	.....

HANDTEKENING VAN EIENAAR *[Signature]* HANDT VAN JAGTER *[Signature]*

Species	Free Living Number	Marking System Type	Marking System Number
1. Roan	28		
2. Sable	32		
3. Tsessebe	36		
4. Nyala	15		
5. Giraffe	3		
6. Impala (Black)	20		
7. Lechwe, Red	35		
8. Springbok	50		
9. Wildebeest, Black	30		
10. Wildebeest, Blue	35		
11. Wildebeest, Red	40		
12. Waterbuck	40		
13. Gemsbok	80		
14. Impala	150		
15. Kudu	20		
16. Zebra, Burchell's	30		
17. Reedbuck, Common	40		
18. Reedbuck, Mountain	15		
19. Eland	30		
20. Dukker, Southern	25		
Bush			
21. Steenbok	25		
22. Ostrich	30		
23. Warthog	100		
24. Bontebok (Not Tested Pure)	45		

**Subject to the following conditions**

**Standard Conditions**

1. In the case of Black and Blue Wildebeest being kept together, they may not leave the farm alive.
2. The permit is invalid unless all requirements of any other legislation in respect of the act mentioned are complied with.
3. This permit is invalid if it is not signed by the permittee and is not transferable.
4. This permit is only valid in its original form.
5. If you intend to add any game species additional to those specified on this certificate, this Department must be notified in writing.
6. This certificate is only valid for game species as specified on this certificate.
7. A register of alterations in game numbers and marking systems must be kept by the owner on the table provided.
8. This Department must be informed if the fencing/camp as inspected by the investigating officer is altered in any way, or alterations are intended.
9. The certificate is issued subject to fencing specifications as indicated on the investigation report by the inspecting officer.
10. Black and Blue Wildebeest may not be kept in the same area

**The department of economic development, tourism and  
environmental affairs**



**the detea**  
The department of economic development,  
tourism, and environmental affairs  
**FREE STATE PROVINCE**

68 Zastron Street  
Agriculture Building  
Third Floor  
Bloemfontein  
9300  
Free State  
South Africa

Permit Office  
Private Bag X 20801  
Bloemfontein  
9300  
Tel: 051-400 9527/28  
Fax: 051-400 9523



**Permittee Details**

8204265032088  
Cedric Roberts  
Maize Flats, Hoopstad  
Hoopstad  
9479

Box 203  
Tel: 053-433 1113  
Fax: 053-433 1113

africasbest@vodamail.co.za  
Cell: 082-577 9347

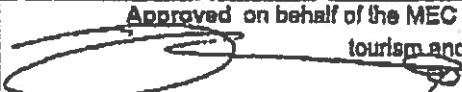
**This Permit is issued in terms of the Biodiversity Act 10 of 2004 (Threatened or Protected Species Regulations) and in terms of Nature Conservation Ordinance no 8 of 1989, permission is hereby granted to the holder of this permit to;**

- Certificate of Adequate Fencing

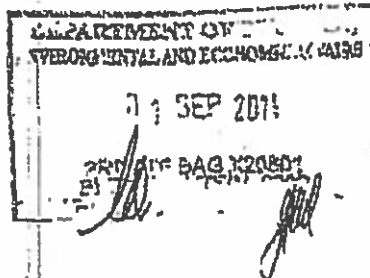
**Particulars of property / fencing of: The whole farm mentioned down below:**

Deed of Transport Number: T00238/2002  
Name of Farm: Viljoenshof & Orando  
Size of Enclosure: 3372,88 ha

Farm Number: 430/998  
District: Boshof  
Property

Permittee's Signature	 Approved on behalf of the MEC economic development, tourism and environmental affairs.	
Expiry Date 2017-08-26 Return Permit After Expiry Date	Permit Number 1007/23686 Lefu Johannes Mosla	Date Issued 2014-08-26

mCr6e1c ICnC2CdCp8l8cCtCd3









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

OMB No. 1018-0164  
Expires 11/30/2016

**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 of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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.

<b>A. Complete if applying as an individual</b>			
1.a. Last name <b>BRAIS</b>	1.b. First name <b>KEITH</b>	1.c. Middle name or initial <b>(b) (6)</b>	1.d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Occupation	4. Affiliation/ Doing business as (see instructions)	
5.a. Telephone number <b>(b) (6)</b>	5.b. Alternate telephone number <b>(925) 417 5270</b>	5.c. Fax number <b>(925) 417 0170</b>	5.d. E-mail address <b>import@b.hunter-international.net</b>

<b>B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution</b>			
1.a. Name of business, agency, Tribe, or institution <b>N/A</b>		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

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

<b>D. All applicants MUST complete</b>	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in <b>Title 50, Part 13 of the Code of Federal Regulations</b> and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <div style="display: flex; justify-content: space-between;"><div>Signature of applicant/person responsible for permit (No photocopied or stamped signatures) <b>Atty. In Fact for Keith (b) (6) Brais</b></div><div>Date of signature (mm/dd/yyyy) <b>04/23/2018</b></div></div>	

Please continue to next page



**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

N/A

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: *Block L9 of the Niassa Reserve, Northern Mozambique*
- b. Date wildlife was hunted: *June 19th, 2017*
- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):

*Skull, Skin including 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 document]:

*Life Form Taxidermy*

*No 7 Aluminium Road, P.O. Box 763, White River 1240, Mpumalanga, 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 appear on the face of the export permit].

Name: Business *Life Form Taxidermy*  
Name: Address: *No 7 Aluminium Road*  
Address: *P.O. Box 763*  
City: *White River 1240*  
State/Province: *Mpumalanga*  
Country, Postal Code: *South Africa*

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: *[Signature]* *Atty. In Fact for Keith* **(b) (6)** *Brais* Date: *04/23/2018*



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. I understand that I may only import two African elephant trophies in one 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.*

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).

ANY U.S FISH & WILDLIFE DESIGNATED PORT OF ENTRY.

9. 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):

HUNTER INT'L BROKERAGE SERVICES, INC.  
5700 Stoneridge Mall Road, Suite 260  
Pleasanton, CA 94588

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.

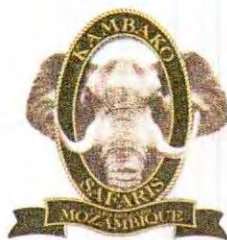
11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Vanessa Tabugan  
Tel# (925) 417 5270 / E-mail: import@b.hunter-international.net

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.

Block B / L8  
Niassa Reserve  
Cabo Delgado Province  
Northern Mozambique



Tel/Fax: +27 41 368 8013  
SA Cell: +27 73 489 4019  
Moz Cell: +258 82 098 1880  
www.kambakosafaris.com  
SKYPE: "jumbosafaris"  
jumbo@kambakosafaris.com

27<sup>th</sup> February 2018

U.S. Fish & Wildlife Services

Attention: FWS Wildlife Inspector

REF: Leopard hunted by Keith Brais in Mozambique

Dear Sir / Madam,

I am Jumbo Moore the Managing Director of Kambako Safaris. Mr Keith Brais successfully hunted a fully mature male leopard within Block A / L9 of the Niassa Reserve in Northern Mozambique in July 2017.

The size of the hunting concession is over 750,000 acres. In the past 5 years, we have been 100% successful on all our leopard hunts and we have never shot a female nor young male leopard. All my PH's use trail camera's to judge the possible cat before it is actively hunted. We have a minimum of 8 game scouts on the ground at any one time and annually we are spending in excess of \$70,000 on anti-poaching.

Block A / L9 does have communities living within it and we are actively trying to educate them about conservation.

Our community development program for the villagers include:

- Employment opportunities of in excess of 40 local people
- Training and passing on of skills to them in which include: law enforcement, animal tracking, skinning, camp running, carpentry, building, road construction and maintenance etc
- 20% of all our animal licence fees collected are deposited into the Community's bank account
- Regular distribution of meat from the game animals hunted to the community

The above points all assist in keeping the community busy and happy and away from poaching.

All our game populations (apart from Elephant) have dramatically increased over the past 5 years since we took over the running of Block A / L9. With the numbers of prey species increasing, our cat predator numbers have increased as well.

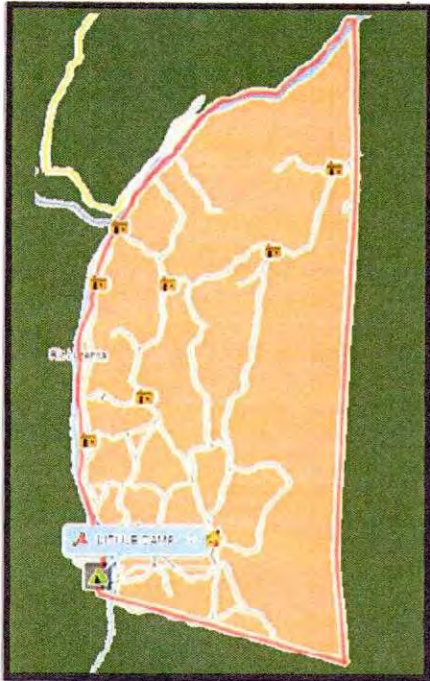
Kambako Safaris – Block A / L9 is a true example that controlled hunting does allow sustainable utilization of Wildlife to the benefit of the local communities.

Directors

S. Bates, T. Dasher, J. McCollum, J. Moore, C. Williams

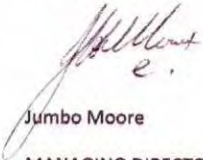


Below is a map of the concession area. The white lines are all roads that we have made in the last 5 years. The roads have allowed us to access new areas, have allowed our anti-poaching teams to patrol the concession better and have allowed us to hunt cats all over the concession and not just in small areas around the safari camp.



If you have any questions, please don't hesitate to contact me.

Yours sincerely,

  
Jumbo Moore

MANAGING DIRECTOR

**CUSTOMS POWER OF ATTORNEY**  
and  
Acknowledgment of Terms and Conditions of Service

Social Security number \_\_\_\_\_  
Date of birth \_\_\_\_\_

Know all men by \_\_\_\_\_

residing at \_\_\_\_\_

(Residential or physical address)

*Keith*

(b) (6)

*BRAS*

(b) (6)

hereby constitutes and appoints: HUNTER INTERNATIONAL BROKERAGE SERVICES, INC., its officers, authorized employees and duly appointed sub-agents to act for and on its behalf as a true and lawful agent and attorney of the grantor named above for and in the name, place, and 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, carnet or other document required by law or regulation in connection with the importation, transportation, or exportation of any merchandise shipped or consigned 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 of manufacture 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, unloading 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 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, unloading, or operation of any vessel or other means of conveyance owned or operated by 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 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;

To waive the requirement of other Customs Brokers transmitting a copy of the customs entry CF7501 and the Customs Broker's bill of services directly to the undersigned grantor in accordance with CF 111.36(a) & (b). Such entry summary and bill will be transmitted through Hunter International Brokerage Services, Inc. It is also understood that the agreement between Hunter International Brokerage Services, Inc. and other Customs Brokers does not forbid or prevent the Customs Broker from having direct contact with the grantor in accordance with CFR 111.36(c)(3).

To generally to transact at the customs houses in any district any and all customs business, including making, signing, and filing of protests under section 514 of the Tariff Act of 1930, 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 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 forgoing power of attorney to remain in full force until notice of revocation in writing is duly given to and received by a District Director of Customs.

The undersigned grantor of this power of attorney hereby agrees to HUNTER INTERNATIONAL BROKERAGE SERVICES, INC. Terms and Conditions of Service, which are attached hereto and incorporated herein by reference.

IN WITNESS WHEREOF, the said (Print full legal name) \_\_\_\_\_

has caused these presents to be sealed and signed: (Signature) \_\_\_\_\_

(Capacity) *Individual*

(Date) *3-5-2018*

Important note: If you are the importer of record, payment to the broker will not relieve you of liability for Customs charges (duties, taxes or other debts owed Customs) in the event the charges are not paid by the broker. Therefore, if you pay by check, Customs charges may be paid with a separate check payable to the "U.S. Customs Service" which shall be delivered to Customs by the broker. Importers who wish to utilize this procedure must contact our office in advance to arrange timely receipt of duty checks

(Mandatory requirement to validate this POA is to provide a CLEAR copy of your passport or driver's license or have this document notarized and mail to our office at Hunter Int'l., 5674 Stoneridge Drive, Ste 209, Pleasanton, CA 94588, tel (925) 417-5270, fax (925) 417-0170)



To whom it may concern.

I, Keith (b) (6) Beas, ID NUMBER/PASSPORT  
NUMBER (b) (6) authorise LIFE-FORM TAXIDERMY  
in South Africa to apply for and collect my veterinary import / in transit  
permit on my behalf for my personal hunting trophies, from Mozambique.

I agree to be bound by to all the terms and conditions of this application  
as well as any permission, permit or authorisation issued as a result  
thereof.

SIGNATURE: Keith (b) (6) Beas

DATE: Jan. 24, 2018

RESIDENTIAL ADDRESS:

(b) (6)  
Miami, FL (b) (6)  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_





# CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

## IMPORT PERMIT

Page 1 of 1

1. Original Permit/Certificate No.

**\*\*US93216C/9**

2. Valid

## 3. Permittee (name and address, country)

KEITH (b) (6) BRAIS

(b) (6)

MIAMI, FL (b) (6)

U.S.A.

## 4. Consignor (name and address, country)

LIFE FORM TAXIDERMY  
NO 7 ALUMINIUM ROAD  
P.O. BOX 763  
WHITE RIVER 1240  
MPUMALANGA  
SOUTH AFRICA

STEPHANIE WHITLEY

Digitally signed by STEPHANIE WHITLEY  
Date: 2018.06.04 12:52:05 -04'00'

## 5. Special Conditions

ALL APPLICABLE FOREIGN, LOCAL, STATE, OR OTHER FEDERAL LAWS, INCLUDING THOSE  
REQUIRING PERMITS, MUST BE OBSERVED.

SPECIMEN MAY NOT BE SOLD OR TRANSFERRED FOR ANY FINANCIAL REMUNERATION.

U.S. THREATENED SPECIES [50 CFR 17.40(f)].

MUST IMPORT THROUGH A DESIGNATED PORT LISTED IN CONDITION 10. PERMITTEE MAY  
ONLY IMPORT TWO LEOPARD TROPHIES PER CALENDAR YEAR.

EACH LEOPARD SKIN MUST HAVE SELF-LOCKING TAG ATTACHED TO IT WHICH INDICATES  
THE STATE OF EXPORT, THE NUMBER OF THE SPECIMEN IN RELATION TO THE ANNUAL  
QUOTA, AND THE CALENDAR YEAR TO WHICH THE QUOTA APPLIES. THE EXPORT PERMIT  
(OR RE-EXPORT CERTIFICATE) MUST CONTAIN THE TAGGING INFORMATION AS OUTLINED  
ABOVE.

TROPHY MUST HAVE BEEN TAKEN DURING 2017 HUNTING SEASON.

*-May not be used for commercial purposes. For live animals, only valid  
if the transport conditions comply with the CITES Guidelines for  
Transport of Live Animals or, in the case of air transport, with IATA Live  
Animals Regulations.*

## 5a. Purpose of Transaction

H

## 6. U.S. Management Authority

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

Issuing Date

United States Management Authority

AUTHORITY: Endangered Species Act of 1973 (16 USC 1531 et. seq.)

## 7/8. Common Name and Scientific name (genus and species) of Animal or Plant

## 9. Description of Part or Derivative, including identifying marks or numbers (age/sex if live)

## 10. Appendix No. and Source

## A. Common Name

LEOPARD

## Scientific Name

PANTHERA  
PARDUS

9. IMPORT PERSONAL SPORT HUNTED TROPHY (shipment  
may contain bones, claws, hide, skull, teeth, or any  
taxidermied part, as well as worked, manufactured, or  
handicraft items such as curios or jewelry, that must  
accompany raw or tanned parts.)

## 10. 1 W

## 11. Quantity (including units)

1

NO

12. Country of Origin  
SOUTH AFRICA

## B. Common Name

## Scientific Name

## 9.

## 10.

## 11. Quantity (including units)

## 12. Country of Origin

## C. Common Name

## Scientific Name

## 9.

## 10.

## 11. Quantity (including units)

## 12. Country of Origin

## D. Common Name

## Scientific Name

## 9.

## 10.

## 11. Quantity (including units)

## 12. Country of Origin

## E. Common Name

## Scientific Name

## 9.

## 10.

## 11. Quantity (including units)

## 12. Country of Origin

Attn: US Fish & Wildlife Service

RCVD MAY 29 2018

This application is being submitted for the reimport of Permit MA04153C-0.

Permit number MA04153C-0 had expired prior to the shipment arriving in the U.S.A. at JFK Airport. This was a mistake on the shippers part that I had no control over.

F.W.S.L.E. office at JFK Airport allowed the reexport of the Elephant base on circumstances of the shippers mistake.

I'm submitting a new permit to bring this Elephant back into the USA.

Thank You Mike Baker

BSR KIA

03299

2nd



## Meehan, John

---

**From:** Villavicencio, Jorge <jorge\_villavicencio@fws.gov>  
**Sent:** Wednesday, May 09, 2018 5:55 AM  
**To:** Meehan, John  
**Subject:** Re: [EXTERNAL] Prt : MA04153C-0

[EXTERNAL]

Mr. Meehan:

Permit number MA04153C-0 is now considered dead and cannot be reissued. Please submit application form 3-200-20, reference MA04153C-0, and include the documentation that you received from law enforcement. Please explain what has happened in your cover letter so that the person processing the application fully understands the situation.

- All applications for elephants are currently under review. We recently posted a memo to our website (found here: <https://www.fws.gov/international/pdf/memo-withdrawal-of-certain-findings-ESA-listed-species-sport-hunted-trophies.pdf>) explaining that, in response to a recent court opinion, we have withdrawn all of our country-wide enhancement findings under the U.S. Endangered Species Act. This includes findings for African elephant, African lion and bontebok. Going forward, we will make enhancement findings on an application-by-application basis.

To do this, we will use much of the same information that we have used to make country-wide findings, as well as any additional information made available to us, for each application we receive. We are still consulting internally regarding this process and thus have not yet issued or denied any permits for these species since the court ruling.

Respectfully,

George D. Villavicencio

---

George D. Villavicencio, J. D.  
Supervisory Policy Specialist  
U.S. Fish & Wildlife Service - Headquarters  
Attn Division of Management Authority - Branch Of Permits  
MS: IA  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
703-358-2483 (Telephone)  
703-358-2280 (Facsimile)  
[Jorge\\_Villavicencio@fws.gov](mailto:Jorge_Villavicencio@fws.gov)

**WARNING:** The contents of this e-mail (including attachments) might be protected under the Privacy Act and intended only for the use of the individual(s) and/or entity(ies) named above. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If the recipient or reader of this e-mail is not the intended recipient, you are hereby notified that any dissemination, disclosure, copying or distribution of the contents of this e-mail message is strictly prohibited. If you have received this e-mail in error, please immediately notify the sender and destroy all copies without reading or disclosing their contents. Thank you.



MAY 29 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 <b>BARBER</b>	1.b. First Name <b>MICHAEL</b>	1.c. Middle Name/Initial <b>(b) (6)</b>	1.d. Suffix
2.a. Business telephone number <b>(b) (6)</b>	2.b. Telephone number	3.a. Alternate telephone number	4. E-mail address

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

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

**Section C: All applicants complete address information**

1. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes) <b>(b) (6)</b>				
1.b. City <b>PRESCOTT</b>	1.c. State <b>ARIZONA</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>
2.a. Mailing address (include if different than physical address; include name of contact person if applicable) <b>(b) (6)</b> <del>PRESCOTT</del> <b>MIKE BARBER</b>				
2.b. City <b>PRESCOTT</b>	2.c. State <b>ARIZONA</b>	2.d. Zip code/Postal code <b>(b) (6)</b>	2.e. County/Province	2.f. Country <b>USA</b>

**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 <i>Title 50 Part 13 of the Code of Federal Regulations</i> and the other applicable parts in <i>subchapter B of Chapter I of Title 50</i> , 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 <b>Michael Barber</b> <b>(b) (6)</b>	Date of signature (mm/dd/yyyy) <b>05/22/2018</b>

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.

MIKE BARBER

(b) (6)

Prescott Valley AZ (b) (6)

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

(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.

African bush Elephant

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:

Kwando Conservatory, Katima Mulilo Namibia

b. Date wildlife was hunted: October 6 2016

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

Leopard Legend  
Lwyk van Vuuren  
Box 445 Gutsi Namibia

- 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

This is the same Elephant that permit MA04153C-0  
Info was supplied on.

**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: Michael (b)(6) Barber Date: 5/22/2018

*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).



DEPARTMENT OF HOMELAND SECURITY  
U.S. Customs and Border Protection

APPLICATION AND APPROVAL  
TO MANIPULATE, EXAMINE, SAMPLE OR TRANSFER GOODS  
19 CFR 19.8, 19.11, 158.43

Form Approved  
OMB No. 1651-0006  
Exp 05-31-2020

1. GOODS CONSIGNED TO (Name) MICHAEL BARBER	2. GOODS EXPORTED FROM NAMIBIA	3. PORT/PORT CODE AND DATE OF APPLICATION 4701/JFK, NY 03/26/2018
4. LOCATION OF GOODS F631 MIQ LOGISTICS	5. CARRIER OR SHIP (Name) SOUTH AFRICAN AIRWAYS	6. BILL OF LADING OR CBP 7512 NO. 083-36599614
7. IS AREA BONDED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	8. ENTRY INFORMATION <input type="checkbox"/> Warehouse <input checked="" type="checkbox"/> Consumption	Number: 988-0566767-6 Date:

PERMISSION IS REQUESTED TO: (Describe the complete operation to be performed under CBP supervision on the goods listed below):  
SHIPMENT CONTAINS ELEPHANT ITEMS THAT ARE BEING DENIED ENTRY INTO THE U.S. DUE TO EXPIRED  
IMPORT PERMIT. WE REQUEST TO MANIPULATE THE ELEPHANT ITEMS TO BE RETURNED TO COUNTRY OF  
ORIGIN NAMIBIA VIA I.E. UNDER AWB 157-38132323.

9. MARKS AND NUMBERS	10. DESCRIPTION	FOR CBP USE ONLY 11. MANIPULATED VALUE
As Addressed	ONE (1) ELEPHANT, AFRICIAN-LIFESIZED OF AFRICA	
	MANIPULATION TO BE SUPERVISED BY INSPECTOR HAMILTON OF FISH & WILDLIFE.	
	As witness by FWS Inspector Hamilton	
		
		
	MIQ LOGISTICS 152-31 135th Avenue Jamaica, NY 11434 Box 527	

12. SIGNATURE OF APPLICANT 	APPROVED 13. DATE 3/28/18	14. SIGNATURE AND TITLE OF APPROVING CBP OFFICER 
--	------------------------------	--

See Page 2 of form for Paperwork Reduction Act Notice. Customs and Border Protection Officers Report on Reverse

CBP Form 3499 (12/16)

1. Date of Import/Export (mm/dd/yyyy): 12/22/2017
2. Import/Export License Number: *****
3. Indicate One: <input checked="" type="checkbox"/> import <input type="checkbox"/> export
4. Port of Clearance: NY
5. Purpose Code: H
6. Customs Document Number(s): 988-05667676/1A03299

## U.S. FISH AND WILDLIFE SERVICE



### DECLARATION FOR IMPORTATION OR EXPORTATION OF FISH OR WILDLIFE

7. Name of Carrier: SOUTH AFRICAN
8. Air Waybill or Bill of Lading No.: Master: 083-36599614 House: 00021212
9. Transportation Code: A  License No. State or Province:
10. Bonded Location for Inspection: F631/MIQ
11. Number of Cartons Containing Wildlife: 1
12. Markings on Cartons Containing Wildlife:

13. (indicate one) <input checked="" type="checkbox"/> U.S. Importer <input type="checkbox"/> U.S. Exporter  MICHAEL BARBER (b) (6) PRESCOTT, AZ (b) (6) (b) (6)	14. (indicate one) <input type="checkbox"/> Foreign Importer <input checked="" type="checkbox"/> Foreign Exporter  KINGS TAXIDERM C/O LODEWYK JANSEN VAN VUUREN PO BOX 445 OUTJO, NA
13b. Identifier Number: ID Type:	14c. Identifier Number: ID Type:
15. Customs Broker, Shipping Agent or Freight Forwarder: Fauna & Flora  Phone Number / Fax Number / Email Address: 7184815405 / 7187237741 / angelo.javate@miq.com	15b. Identifier Number: ID Type:  15c. Contact Name: Angelo Javate

Species Code	16a. Scientific Name 16b. Common Name	17a. Foreign CITES Permit Num. 17b. U.S. CITES Permit Num.	18a. Description Code 18b. Source	19a. Quantity/Units 19b. Total Monetary Value	20. Country of Species Origin Code (ISO Code)	21. Venomous Live Wildlife Indicator
EQZH	EQUUS ZEBRA HARTMANNAE HARTMANN'S MT. ZEBRA	0054344	TRO W	2.00 NO \$ 991	NA	<input type="checkbox"/>
GEMS	ORYX GAZELLA GEMSBOK		TRO W	1.00 NO \$ 141	NA	<input type="checkbox"/>
GRKU	TRAGELAPHUS STREPSICEROS GREATER KUDU		TRO W	1.00 NO \$ 166	NA	<input type="checkbox"/>
HIPN	HIPPOTRAGUS NIGER SABLE ANTELOPE		TRO W	1.00 NO \$ 182	NA	<input type="checkbox"/>

Knowingly making 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:  
Filed Electronically 12/28/2017 - Confirm Num: 2017NY2157298  
Fee Total - CorporateID C107 : \$93.00

Action/Comments: 04/16/2018. African elephant trophy was imported on an expired ESA import permit. African elephant must be re-exported to country of Origin only. Importer must obtain a valid CITES and ESA permit
Wildlife Declared
Wildlife Inspected: Partial
Service K-9 Utilized: No
Inspected By: Hamilton, WI0437

Dec Control Num: 2018336882

U FISH &amp; WILDLIFE SERVICE S

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Electronic Filing

CLEARED

see comments

Date: 04/16/2018

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**U.S. FISH AND WILDLIFE SERVICE**



Page 2 of 2

**DECLARATION FOR  
IMPORTATION  
OR EXPORTATION OF  
FISH OR WILDLIFE**

2. I/E License Number:  
\*\*\*\*\*

**CONTINUATION SHEET**

13. Name of Importer/Exporter:  
**MICHAEL BARBER**

8. Air Waybill or Bill of Lading Number:  
Master: 083-36599614  
House: 00021212

Species Code	16a. Scientific Name 16b. Common Name	17a. Foreign CITES Permit Num. 17b. U.S. CITES Permit Num.	18a. Description Code 18b. Source	19a. Quantity/Units 19b. Total Monetary Value	20. Country of Species Origin Code (ISO Code)	21. Venomous Live Wildlife Indicator
WATE	KOBUS ELLIPSIPRYMNUS WATERBUCK		TRO W	1.00 NO \$ 192	NA	<input type="checkbox"/>
LOAF	LOXODONTA AFRICANA AFRICAN ELEPHANT	0054878 MA04153C-0	TRO W	1.00 NO \$ 3177	NA	<input type="checkbox"/>
						<input type="checkbox"/>
						<input type="checkbox"/>
						<input type="checkbox"/>
						<input type="checkbox"/>
						<input type="checkbox"/>
						<input type="checkbox"/>
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						<input type="checkbox"/>
						<input type="checkbox"/>
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						<input type="checkbox"/>

Knowingly making 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).

I certify under penalty of perjury that the information furnished is true and correct:

Filed Electronically 12/28/2017

U S FISH & WILDLIFE SERVICE S  
N I T E D  
*Electronic Filing*  
**CLEARED**  
*see comments*  
T A T E S

Date: 04/16/2018

DRAFT

157 JFK 38132323

157-38132323

Shipper's Name and Address <b>BARBER, MICHAEL</b> <b>(b) (6)</b>		Shipper's Account Number		Not Negotiable <b>Air Waybill</b>	
PRESCOTT AZ <b>(b) (6)</b> Telephone: <b>(b) (6)</b>				Issued by <b>QATAR AIRWAYS (W.L.L.)</b> <b>ALMANA TOWER</b> <b>P.O. BOX 22550, AIRPORT ROAD, QATAR</b>	
Consignee's Name and Address <b>YELLOW SHARK LLC</b> <b>PO BOX 81413</b>		Consignee's Account Number		Copies 1, 2 and 3 of this Air Waybill are originals and have the same validity	
OLYMPIA WINDHOEK NA Telephone: +26461304030				It is agreed that the goods described herein are accepted in apparent good order and condition (except as noted) for carriage SUBJECT TO THE CONDITIONS OF CONTRACT ON THE REVERSE HEREOF. ALL GOODS MAY BE CARRIED BY ANY OTHER MEANS INCLUDING ROAD OR ANY OTHER CARRIER UNLESS SPECIFIC CONTRARY INSTRUCTIONS ARE GIVEN HEREON BY THE SHIPPER. AND SHIPPER AGREES THAT THE SHIPMENT MAY BE CARRIED VIA INTERMEDIATE STOPPING PLACES WHICH THE CARRIER DEEMS APPROPRIATE. THE SHIPPER'S ATTENTION IS DRAWN TO THE NOTICE CONCERNING CARRIER'S LIMITATION OF LIABILITY. Shipper may increase such limitation of liability by declaring a higher value for carriage and paying a supplemental charge if required.	
Issuing Carrier's Agent Name and City <b>MIQ GLOBAL LLC DBA MIQ LOGISTICS</b> <b>JAMAICA</b>				Accounting Information <b>SRN</b> <b>GEN FLT#QR023</b>	
Agent's IATA Code <b>01-1 0009/0084</b>		Account No.			
Airport of Departure (Addr. of First Carrier) and Requested Routing <b>JOHN F. KENNEDY APT/NEW YORK</b>				Reference Number <b>CJFKEA02196</b>	
To	By First Carrier	Routing and Destination	to	by	to
<b>WDH</b>		<b>QR</b>			
Airport of Destination <b>WINDHOEK</b>			Requested Flight/Date <b>QR023/04 /</b>		Amount of Insurance <b>XXX</b>
Declared Value for Carriage <b>NVD</b>			Declared Value for Customs <b>NCV</b>		
Handling Information: PLEASE CONTACT CNEE UPON ARRIVAL --- ALL DOCUMENTS ATTACHED PACKAGES MARKED AS ADDRESSED					
SCI					
No. Of Pieces RCP	Gross Weight	kg	Rate Class	Chargeable Weight	Rate
1	100.0	K	Q	189.5	
Commodity Item No.			Total		
			As Agreed		
Nature and Quantity of Goods (Incl. Dimensions or Volume)					
GAME TROPHIES IE# 558957302 DIMS 67x37x28 IN x 1					
Prepaid		Weight Charge		Collect	
Valuation Charge		Tax		Total Other Charges Due Agent	
Total Other Charges Due Carrier		Total Prepaid		Total Collect	
Currency Conversion Rates		CC. Charges in Dest. Currency		27-Mar-18	
Charges at Destination		Total Collect Charges		JAMAICA	
For Carrier's use only at Destination				PAUL A DECRUIZ	
				Signature of Issuing Carrier or its Agent	

Original 1 - (for Issuing Carrier)

157-38132323





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

FEDERAL FISH AND WILDLIFE PERMIT

1. PERMITTEE

MICHAEL (b) (6) BARBER

PRESCOTT VALLEY, AZ (b) (6)

U.S.A. (b) (6)

2. AUTHORITY-STATUTES  
16 USC 1539 (a)

REGULATIONS  
50 CFR 17.40 (e)

3. NUMBER  
MA04153C-0

4. RENEWABLE  
☒ YES  
☐ NO

5. MAY COPY  
☐ YES  
☒ NO

6. EFFECTIVE  
09/26/2016

7. EXPIRES  
09/25/2017

8. NAME AND TITLE OF PRINCIPAL OFFICER (If not a business)

9. TYPE OF PERMIT  
ELEPHANT IMPORT FROM NAMIBIA

10. LOCATION WHERE AUTHORIZED ACTIVITY MAY BE CONDUCTED  
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

11. CONDITIONS AND AUTHORIZATIONS:

A. GENERAL CONDITIONS SET OUT IN SUBPART D OF 50 CFR 13, AND SPECIFIC CONDITIONS CONTAINED IN FEDERAL REGULATIONS CITED IN BLOCK #2 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.

B. THE VALIDITY OF THIS PERMIT IS ALSO CONDITIONED UPON STRICT OBSERVANCE OF ALL APPLICABLE FOREIGN, STATE, LOCAL, TRIBAL, OR OTHER FEDERAL LAW.

C. VALID FOR USE BY PERMITTEE NAMED ABOVE.

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

E. Authorized to import the sport-hunted trophy of one African elephant (*Loxodonta africana*), taken in Namibia for the purpose of enhancement of the survival of the species.

F. Specimen may not be sold or transferred for any financial remuneration.

G. U.S. Threatened Species: tusks must be marked as per [50 CFR 17.40(e)]. In accordance with the African Elephant Conservation Act, raw ivory, including sport-hunted trophies that are wholly or partially ivory, may not be re-exported from the U.S.

H. Trophy must have been taken during the 2016 hunting season.

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

☒ ADDITIONAL CONDITIONS AND AUTHORIZATIONS ALSO APPLY

12. REPORTING REQUIREMENTS

ISSUED BY

Many Coglianor

TITLE

CHIEF, BRANCH OF PERMITS, DMA

DATE

09/26/2016



CONVENTION ON  
INTERNATIONAL TRADE IN  
ENDANGERED SPECIES OF  
WILD FAUNA AND FLORA

PERMIT / CERTIFICATE No.

EXPORT

0054878

RE-EXPORT

Original

IMPORT

OTHER:

2 Valid until

05/06/2018

3 Importer (name and address)

Michael (b) (6) Barber

(b) (6)

AZ (b) (6)

(b) (6)

3a. Country of import

USA

5. Special conditions

Not valid if not certified by the Namibian customs.  
Tusks no's: NA 16 0098 11.10 & NA 16 0098 12.00

All imports and exports remain subject to veterinary regulations.  
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 the transaction (see reverse)

H

5b. Security stamp No.

1555393

4. Exporter / Re-exporter (name, address and country)

Lodewyk Jansen van Vuuren

P. O. BOX 445

Outjo

Namibia

Signature of the applicant

6. Name, address, national seal/ stamp and country of Management Authority



MINISTRY OF ENVIRONMENT AND  
TOURISM

Directorate: Scientific Services  
Private Bag 13306  
Windhoek  
NAMIBIA

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

7./8. *Loxodonta africana*

African elephant

9. 2x Tusks

10. II W

11. 2 item

11a. 70/90  
(2017)

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 \*\*\*

7./8. *Loxodonta africana*

B African elephant

9. 2x ears, 2x feet, 5x skin  
panels & trunk

10. II W

11. 10 item

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 \*\*\*

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 \*\*\*

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 IS ISSUED BY

J. Shapi

Windhoek

Place

05/12/2017

Date

14. EXPORT ENDORSEMENT:

15. Bill of Lading / Air Waybill Number

083 3659 9614

Block	Quantity
A	2
B	10
C	
D	

Port of Export / Re-export

Hair

Date

13/12/17

Signature

Official stamp and title

Namprint: 2308

Original







RECD MAY 29 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 <b>Turchin</b>	1.b. First Name <b>Martin</b>	1.c. Middle Name/Initial	1.d. Suffix
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 <b>Palm Beach Gardens</b>	1.c. State <b>FL</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>
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 <i>Title 50 Part 13 of the Code of Federal Regulations</i> and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) <span style="float: right;">Date of signature (mm/dd/yyyy)</span> <div style="display: flex; justify-content: space-between; align-items: center;"> <span style="font-size: 24px; font-family: cursive;">5/19/18</span> </div>	

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)?

Martin Turchin

(b) (6)

(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.

African Elephant

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:

Zimbabwe, Tsholotsho South, near Tsholotsho Town  
Area 2, S19 23 644 E 026 53 452

b. Date wildlife was hunted:

May 2 2015

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

Chapungu Safaris / Lodzi Hunters

- 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]:

Matabeleland Taxidermist  
16 Birmingham 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).
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: Matabeleland Taxidermist  
Business Name: 16 Birmingham Rd  
Address:  
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?

I hunted with Lodzi Hunters. Attached is a description of their conservation efforts and community perpetuating which is significant. This was one of the reasons I elected to hunt with them.

- 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

See A Above

**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: 5/20/18

*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).






## Spotlight on Tsholotsho South CAMPFIRE Area in the aftermath of the 2013 Cyanide Poisoning of Elephant

Hwange National Park's eastern boundary, which stretches for over 220kms, is maintained with the co-operation of adjacent communities. CAMPFIRE Communities in Bulilima district from Point 222 at corner with Botswana, all the way northwards through Korodziba/Makona in Tsholotsho, connecting to the Ngamo Forest boundary, provide an important conservation buffer zone. Tsholotsho district was granted Appropriate Authority Status for the management of wildlife in 1991, and has 11 Wards that benefit from the CAMPFIRE Programme.

Although human and wildlife conflict is high, local communities have voluntarily maintained the buffer area between the park boundary and the area of human settlement from which they benefit from the sustainable utilization of wildlife under CAMPFIRE.



Tsholotsho district has two safari hunting areas: Tsholotsho North (170 000ha) and Tsholotsho South (240 000ha). Lodzi Hunters operates in the south, comprising Wards 1, 7, 8, 10, and 21, where the conservation of wildlife has made significant impact on the lives of people. Below we explain how this is possible for an area that hit local and international news headlines just over three years ago following the cruel poisoning of over 100 Elephants.

What most media reports missed about this first major poisoning incident in Zimbabwe is that in fact, it was Lodzi Hunters anti-poaching scouts, after only 4 months in the area that uncovered the catastrophe of the Cyanide poisoning. In the initial 8 months of its contract (April to December 2013) Lodzi Hunters conducted 120% of the anti-poaching logistics in the South Eastern section of Hwange National Park, in addition to the Tsholotsho South CAMPFIRE area. This effort also catalyzed and galvanized other support efforts and donations to the Park from the private sector e.g. Land Rovers for ranger patrols.

Lodzi Hunters have maintained a 10 man anti-poaching team in the area to this day, which has removed over 1 000 wire snares since 2013, and works closely with Parks anti-poaching patrol teams.

No new snares have been found in the area in the past year, and this is testimony to the effectiveness of this anti-poaching effort.

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Plains game populations in the Tsholotsho South CAMPFIRE area are visibly recovering. There is now a pack of 10 Wild Dogs frequenting the area; these were never seen in this area since 1996. This is living proof that the plains game is on the increase, as Wild Dogs need prey to hunt.

Lodzi Hunters won the tender to hunt in Tsholotsho south in 2013. Communities have their own bank accounts and receive cash from the operator under a "CASH DIRECT TO THE COMMUNITY" system. This is done so the community sees what an Elephant is worth to them, the owners of that Elephant.

The current annual quota in the Tsholotsho South CAMPFIRE concession has a Trophy Elephant quota of 12 to 14 animals. On average, 13 Elephants are hunted, and the community gets 60% of the Income paid as Concession Fees and Trophy Fees. The remainder goes to Tsholotsho Rural District Council (36%) and CAMPFIRE Association (4%).

Tsholotsho district generates more from trophy Elephant sold to foreign hunting clients than any other CAMPFIRE area (i.e. includes hunting days, food and drinks, a Professional Hunter and 4x4 Vehicle and the trophy fee). Tsholotsho brings a huge amount of value to the Elephant as a trophy animal. The current trophy fee for a trophy Elephant bull is nearly USD 20 000.

However, district has also been affected by declining hunter arrivals due to negative perceptions about community benefits from wildlife, which animal welfare groups are using to petition key global markets for wildlife products, resulting in the imposition of bans on elephant and lion trophy imports, and even airline embargoes on trophies as means of banning hunting in general.

#### Tsholotsho South Hunting Concession Actual Income Distribution: 2013-2015

		2013	2014	2015
RDC		116,653.00	95,806.00	81,623.00
COMMUNITY	NO. OF HOUSEHOLDS			
WARD 1	739	24,880.00	23,948.00	17,021.00
WARD 7	807	27,083.00	23,948.00	21,217.00
WARD 8	1741	28,019.00	23,948.00	12,612.00
WARD 10	718	28,019.00	29,974.00	20,834.00
WARD 21	439	28,019.00	23,948.00	21,374.00
Total beneficiaries and income to communities	4444	136,020.00	125,766.00	93,058.00

Lodzi Hunters are engaged in a massive, aggressive and beneficial community social responsibility programme. Over the past three and a half years, about half a million US dollars in direct cash has been spent on transport - for food (600 tons of maize), building supplies, river sand (500 tons), school children for sports and cultural events, and for the local community and the two local chiefs in general; water - drilling of boreholes and fixing and rehabilitating pumps and diesel engines, fixing and clearing out silted pans and broken dams; roads - construction of new and rehabilitating old roads; education - sponsoring school prize giving occasions, both for the event and actual prizes for pupils, sponsoring 16 pupils yearly school fees; food and drought relief - establishing grinding mills in the community, emergency livestock stock feed and baled grass to the local communities in the desperate drought month, water bowser delivery to areas where boreholes are temporarily out of action (sometimes 30 kilometers delivery distances); funeral assistance - assisting and paying for funeral costs of local community members; health - contributing to building of Rural Health Centers; and assisting with national events i.e. Independence Day, Heroes Day commemorations.

Further, 90% of elephant meat is delivered from the average of 13 trophy Elephant direct to the local community throughout the 5 Wards (i.e. 23 000 kilograms of protein).

Lodzi Hunters also assists Hwange National Park, especially the South Eastern side of the Park, Makona and Josivanini area, and the Zimbabwe Parks and Wildlife Management Authority (ZPWMA) in general with their operations i.e. anti poaching patrols and logistics, transport, re-building of base stations, fuel, aerial reconnaissance and surveys, vehicle repairs and maintenance, and assisting with cleaning out silted pans within the Park.

#### Wildlife funded CAMPFIRE community projects in Tsholotsho District

Ward	Projects
1	<ul style="list-style-type: none"> <li>• Mono pump system for water provision.</li> <li>• Water engine parts for Nyanganyuni Line, Sihazela, Nintili, Nyadzi Line.</li> <li>• Borehole engine parts for four villages.</li> <li>• Solar pump water system at Gibixhegu and Gwabazabuya Line, in conjunction with safari operator.</li> <li>• Sihazela Primary School classroom block, in conjunction with safari operator.</li> </ul>
2	<ul style="list-style-type: none"> <li>• Toilets for headman's courtroom.</li> <li>• Engine belts for borehole repairs at Zamazama, Sizanani, Zwananani and Thandanani villages.</li> <li>• Borehole drilled at Kope Line.</li> <li>• Water pump for water provision.</li> </ul>

	<ul style="list-style-type: none"> <li>• Solar pump water system at Dlamini Clinic and Gombalume Primary School Line</li> <li>• Construction of Bhemba Clinic.</li> </ul>
3	<ul style="list-style-type: none"> <li>• Borehole drilled and cased at Nyelesi Village, Mtshwayeli and Ntulula.</li> <li>• Borehole at Mashula and Vulashaba Line.</li> <li>• Fifty chairs for Kapane Secondary School.</li> <li>• Classroom block at Mlevu and Mtshwayeli Primary Schools.</li> <li>• A new school under construction at Ntulula Village.</li> <li>• Re-roofed classroom block at Kapane.</li> </ul>
4	<ul style="list-style-type: none"> <li>• Classroom block at Dibutibu Primary School</li> <li>• A mini weather station was installed at Dibutibu Line, in conjunction with World Wide Fund for Nature (WWF).</li> <li>• Solar pump water system at Dibutibu Business Centre.</li> <li>• Ten sewing machines for Dibutibu Secondary School.</li> <li>• F14 staff cottage at Siphongweni Primary School.</li> <li>• Water storage tank and stand for Dibutibu dip tank.</li> </ul>
5	<ul style="list-style-type: none"> <li>• Building material for classroom block at Sipepa Primary School.</li> <li>• Classroom blocks at Mcetshwa, Jakalasi, and Gwaii Primary Schools.</li> <li>• Rehabilitation of ten blair toilets at Jakalasi Primary School.</li> <li>• Mpindo classroom block, in conjunction with safari operator.</li> </ul>
6	<ul style="list-style-type: none"> <li>• School furniture (chairs and desks) for Nkwizhu Primary School for 2 classroom blocks.</li> <li>• Boreholes drilled at Mahlosi, Manyenge, Nkwizhu, Jimila, Tshino Line.</li> <li>• Diesel generator was purchased for Tshino Primary School.</li> <li>• Rehabilitation of Mothers' Waiting Room at Jimila Clinic.</li> <li>• School furniture (50 senior chairs and 25 senior dual desks) for Jimila Secondary Schools.</li> <li>• Tuck shops at Tshino and Zabagwadi Line.</li> <li>• Teachers' cottage at Mahlaba Primary School.</li> <li>• Two classroom blocks at Nkwizhu Primary School.</li> </ul>
7	<ul style="list-style-type: none"> <li>• Lister engine and water tank at Purnula Village.</li> <li>• 7km piped water scheme at Gulalika Hill.</li> <li>• Diesel pump engine at Phelandaba Primary School, in conjunction with the safari operator.</li> <li>• Classroom block and teachers cottage re-roofed at Phelela and Mpilo Primary School.</li> <li>• Community Hall and general dealer store constructed at Patalika.</li> <li>• Barrier to ward off elephants away from crop fields was set up at Phelela Line, through GEF/World Bank funded HSBC project.</li> </ul>
8	<ul style="list-style-type: none"> <li>• Tshitatshawa Clinic, 99% complete. Staff cottages roofed.</li> <li>• Borehole installed at Tshitatshawa Clinic.</li> <li>• Fencing of Tshitatshawa Clinic.</li> <li>• Solar pump water system at Folosi Line.</li> <li>• Classroom block and tennis court at Mbiriya Primary School.</li> <li>• Borehole at Mbiriya Primary School.</li> </ul>
9	<ul style="list-style-type: none"> <li>• Building material for construction of the second wing at Jowa Clinic.</li> <li>• Chief Tategulu's court house.</li> <li>• 30 wheelbarrows, 30 shovels and 30 picks for rehabilitation of dams.</li> <li>• Classroom block constructed at Malindi in Ward 9.</li> </ul>
10	<ul style="list-style-type: none"> <li>• F14 staff cottage at Zibalongwe Primary School.</li> <li>• Rehabilitation of classroom block at Zibalongwe Primary School.</li> <li>• Three boreholes at Manganga village, Sikente Secondary School and Mtshina Line.</li> <li>• Maphane community hall.</li> <li>• Sikente Clinic completed.</li> </ul>
21	<ul style="list-style-type: none"> <li>• Five pump minder kits.</li> <li>• Six Lister water pump engines.</li> <li>• 5 000 litre water storage tank.</li> </ul>

- Borehole at Tshibizina for clinic site.
- Chief Tategulu's court house.

### Safari Operator Social contribution

Lodzi Hunters are engaged in a massive and beneficial community social responsibility programme. Over the past three and a half years, about half a million US dollars in direct cash has been spent on transport - for food (600 tons of maize), building supplies, river sand (500 tons), school children for sports and cultural events, and for the local community and the two local chiefs in general; water - drilling of boreholes and fixing and rehabilitating pumps and diesel engines, fixing and clearing out silted pans and broken dams; roads - construction of new and rehabilitating old roads; education - sponsoring school prize giving occasions, both for the event and actual prizes for pupils, sponsoring 16 pupils yearly school fees; food and drought relief - establishing grinding mills in the community, emergency livestock stock feed and baled grass to the local communities in the desperate drought month, water bowser delivery to areas where boreholes are temporarily out of action (sometimes 30 kilometers delivery distances); funeral assistance - assisting and paying for funeral costs of local community members; health - contributing to building of Rural Health Centers; and assisting with national events i.e. Independence Day, Heroes Day commemorations.

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No new cases of cyanide poisoning have been recorded in Tsholotsho District this year. Anti-poaching awareness campaigns are regularly conducted. Communities have prioritized the construction of sub-offices for anti-poaching and problem animal control to service hot spot areas around Phelandaba and Mtshwayeli.

### The result:

No new cases of cyanide poisoning have been recorded in Tsholotsho District this year. Anti-poaching awareness campaigns are regularly conducted.

Communities have prioritized the construction of sub-offices for anti-poaching and problem animal control to service hot spot areas around Phelandaba and Mtshwayeli.

Please kindly donate and support this conservation effort.

[◀ Prev \(/index.php/news-spotlight/22-the-gorges-lodge-project-hwange-district-campfire-program\)](#)

## Subscribe to news and updates




## Get in touch


Mukuvisi Woodlands  
Cnr Hillside Rd / Glenara Ave South  
Harare  
Zimbabwe  
Phone: +263 (4) 747 422  
Email: [email@campfirezimbabwe.org](mailto:email@campfirezimbabwe.org)


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ZK 2015 23031

**CERTIFICATE OF OWNERSHIP OF IVORY AND RHINOCEROS HORN**  
(Issued in terms of section 77 of the Parks and Wildlife (General) Regulations, 1990)

PROCESSED BY THE FIELD OFFICE AUTHORITY  
WESTERN REGION  
SENIOR RANGER OFFICER

26 MAY 2015  
REGIONAL OFFICE  
P.O. BOX 283, S. LUNDA  
TEL: 0202417

Cert. No 120217

MARTIN TUECHIN

Address  
PALM BEACH FLORIDA  
U.S.A

Specified officer's signature and date-stamp

Tusk serial number

Tusk mass (kg)

Tusk length (metric)

Sex

Authority

Signature of holder

Notes

1. This certificate must be returned to the Director, Department of National Parks and Wildlife Management, P.O. Box CY 140, Causeway, in the event of the tusk being cut up for manufacturing purposes, lost, stolen or exported.
2. Transfer/sale of ivory or horn is to be done at National Parks offices.

ZK 2015 23031

2444

165 cm

MALE

TRZ 076359

Cert. No 120218

MARTIN TUECHIN

Address  
SEACH GARDENS  
FLORIDA U.S.A

Specified officer's signature and date-stamp

Tusk serial number

Tusk mass (kg)

Tusk length (metric)

Sex

Authority

Signature of holder

Notes

1. This certificate must be returned to the Director, Department of National Parks and Wildlife Management, P.O. Box CY 140, Causeway, in the event of the tusk being cut up for manufacturing purposes, lost, stolen or exported.
2. Transfer/sale of ivory or horn is to be done at National Parks offices.

ZK 2015 23032

2244

166 cm

MALE

TRZ 076359







**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 1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

Type of Activity

**IMPORT OF SPORT-HUNTED TROPHIES OF BONTBOK  
TROPHIES FROM SOUTH AFRICA**

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 <b>PRAGER</b>	1 b. First Name <b>RICHARD</b>	1 c. Middle Name/initial <b>(b) (6)</b>	1 d. Suffix <b>N/A</b>
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number <b>(b) (6)</b>	3 a. Alternate Telephone Number <b>N/A</b>	3 b. E-mail address <b>(b) (6)</b>

**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		5. 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>(b) (6)</b>				
1 b. City <b>GREENWICH</b>	1 c. State <b>CT</b>	1 d. Zip code/Postal code <b>(b) (6)</b>	1 e. County/Province <b>(b) (6)</b>	1 f. Country <b>USA</b>
2 a. Mailing address (include if different than physical address; include name of contact person if applicable) <b>(b) (6)</b>				
2 b. City <b>GREENWICH</b>	2 c. State <b>CT</b>	2 d. Zip code/Postal code <b>(b) (6)</b>	2 e. County/Province <b>(b) (6)</b>	2 f. Country <b>USA</b>

**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)  <div style="display: flex; justify-content: space-between;"> <div>   <b>11 MAY 2018</b> </div> <div> <b>5.11.2018</b> </div> </div>

Please continue to next page

**IMPORT OF SPORT-HUNTED BONTBOK TROPHIES from South Africa**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit to the address on page one.**

**Note 2:** 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:** The bontebok is listed as endangered under the Endangered Species Act. Applications for endangered species permits must be published in the Federal Register for a 30-day public comment period. Allow at least **90 days** for the application to be processed.

**Note 4:** This application can only be used if you have hunted/will be hunting in **South Africa**. If you have or will be hunting in a different country, please use form [3-200-20](#) ✓

**Note 5:** *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:
  - 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;
  - 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
  - The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

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.

*RICHARD PRAGER*  
(b) (6)

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

*RICHARD PRAGER*  
(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. How many Bontebok (*Damaliscus pygargus pygargus*) are you applying to import? Quantity: 1 (ONE)

- a. At the time of the application, the specimen(s) is:

Alive

Dead

- b. What is the approximate date of proposed take? 9-15 AUG 2017

- c. What is the date you took the animal? 11 AUG 2017

- 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]:

KAROO TAXIDERM  
15 VAN DER BIJL STREET  
GRAAFF-REINET 6280 SOUTH AFRICA | TIM VAN HEERDEN  
MANAGER  
+2749 892 6151

5. ENTER the name and address of the landowner on whose property the bontebok was or will be taken:

Owners name: JAN PICKARD  
Farm Name: RATELFONTEIN  
District:  
Address: P.O. BOX 84  
City: RICHMOND  
State/Province: NORTHERN CAPE  
Country, Postal Code: SOUTH AFRICA 7090

Please be aware that the bontebok is listed in Appendix II of CITES. As such, you must obtain a CITES export permit from South Africa. If you are not exporting the trophy from South Africa directly to the United States, you will need to obtain a CITES Re-export certificate from the re-exporting country.

6. Attach a signed statement from the landowner giving you permission to cull a bontebok from their captive herd.

SEE ATTACHED

7. If available, provide a copy of the landowner's Certification of Registration for the bontebok herd. (Note: this is not a copy of the export permit or certificate issued by a South African province.) In order to meet the criteria for a permit under the Endangered Species Act, the bontebok must be culled from a ranch that has been certified by the Government of South Africa under their bontebok program. If the ranch is not registered, we may be unable to issue an import permit.

SEE ATTACHED

8. Complete name and address of overseas person or business shipping the trophy to you (this name will appear on the face of the permit).

Name: TIM VAN HEERDEN  
Business Name: KAROO TAXIDERMY  
Address: 15 VAN DER BIJL STREET  
City: GRAAFF-REINET  
State/Province: SOUTH AFRICA  
Country, Postal Code: 6280

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. 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).

Taxidermist/Broker's signature: \_\_\_\_\_ Date: \_\_\_\_\_

10. 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).

Applicant's signature:  \_\_\_\_\_ Date: 5.11.2018

*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 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).



15 May 2018

TO WHOM IT MY CONCERN

**RE: HUNTING CLIENT - RICHARD PRAGER BONTEBOK TROPHY**

We, Ratelfontein Farms (Pty) Ltd, hereby confirm having given Mr. Richard Prager (USA Passport No [REDACTED]) permission to hunt/cull a Bontebok ram from our herd on Ratelfontein.

Yours sincerely,

**JAJ Pickard**  
Director & Hunting Outfitter







Issued in terms of the provisions of:  
National Environmental Management  
Biodiversity Act 10 of 2004

**Biodiversity**  
**Northern Cape Province**  
**Integrated Competence**

**Permit**

**Standing**

**Game Farm / CAE**

**Game Farm - Plains Game**

**SPECIES AND NUMBERS, RESTRICTED ACTIVITIES AND PERMIT CONDITIONS  
AS PER ADDENDUM 1 AND PAGES ATTACHED**

*Authorising Entity / Institute / Company*

**Ratelfontein Hunting Safaris**

Jan Albertus Jacobus Pickard - ID or Passport (b) (6) Farm name: - Physical Address: Ratelfontein Private Game Reserve - Cape Town - Western Cape Province - 8000

Postal address: PO Box 84, Richmond, Northern Cape, 7090

Contact details: Office: - Home: 0217946827 - Cell: +27826898282 - Fax: 0217947401 - E-mail: info@ratelfontein.com

**Game Farm**

**Ratelfontein Private Game Reserve**

**Hectares**

**18,183.00**

**In the Division -**

**Karoo - Northern Cape Province**

Of which the description of boundaries is as follows

**The property known as Ratelfontein Private Game Reserve the boundaries of which are described in Deed of Transfer No. T. 54966/1987, T. 29047/1987 & T. 69423199**

**Fence classification**

**1A (2,4m with mesh)**

*Digital signature of verifier*

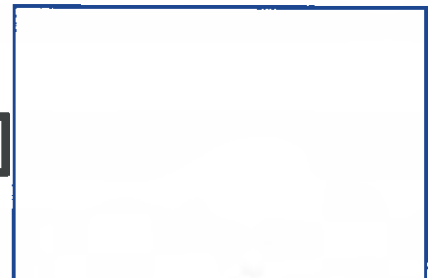
**CScholtz**  
Digitally signed by CScholtz  
DN: C=ZA, E=cscholtz@ncpg.gov.za, O=Department of Environment and Nature Conservation, OU=Permit Administration CN=CScholtz  
Location: Kimberley  
Reason: This document has been verified as correct according to departmental legislation, policies and prescripts and I attest to the accuracy and integrity of this document.  
Contact Info: +27538077451  
Date: 2014.04.25 15:35:42+0200

*Issuing authority*

**VALIDITY PERIOD**

**FROM 25/04/2014 TO 25/04/2019**

*Stamp if applicable*



*Permit holder / Dealer*

Page 1 of 7

Signature of Issuing Authority

25 April 2014

Signature of Permit Holder

Date of Signature

Department of Environment and Nature Conservation - 80 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 0936

(Up) Tel: 054-332286 Fax: 054-3311155

## 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 08/04/2014 with receipt number: Ratelfontein - 691288695

### SPECIES AND NUMBERS PERMITTED

Arabian Oryx, Arabiese-gemsbok, Oryx leucoryx  
 Bison, Bison, Bison bison  
 Black Wildebeest, Swartwildebees, Connochaetes gnou  
 Blesbuck, Blesbok, Damaliscus pygargus phillipsi  
 Blue Wildebeest, Blouwildebees, Connochaetes taurinus  
 Bontebok, Bontebok, Damaliscus pygargus pygargus  
 Burchell's Zebra, Bontsebra, Equus burchellii  
 Common Reedbuck, Rietbok, Redunca arundinum  
 Eland, Eland, Taurotragus oryx oryx  
 Fallow Deer, Hert, Dam, Cervus dama  
 Gemsbuck, Gemsbok, Oryx gazella  
 Giraffe, Kameelperd, Giraffa camelopardalis  
 Grey Rhebuck, Vaalribbok, Pelea capreolus  
 Hartmann's Mountain Zebra, Hartmannse bergsebra, Equus zebra hartmannae  
 Impala, Rooibok, Aepyceros melampus melampus  
 Indian Blackbuck, Indiese swartbok, Antelope cervicapra  
 Klipspringer, Klipspringer, Oreotragus oreotragus  
 Kudu, Koedoe, Tragelaphus strepsiceros  
 Mountain Reedbuck, Rooiribbok, Redunca fulvorufula  
 Red Hartebeest, Rooihartebees, Alcelaphus buselaphus  
 Red Lechwe, Rooilechwe, Kobus leche leche  
 Sable, Swartwitpens, Hippotragus niger niger  
 Sassaby, Tsessebe, Damaliscus Lunatus  
 Scimitar horned Oryx, Kromhoringgemsbok, Oryx dammah  
 Springbok, Springbok, Antidorcas marsupialis  
 Steenbok, Steenbok, Raphicerus campestris  
 Waterbuck, Waterbok, Kobus ellipsiprymnus

### RESTRICTED ACTIVITIES AND METHODS PERMITTED

Having in possession or exercising physical control over any DEAD specimen - by using the following prohibited method and/or instrument namely: as stipulated in point 2 of the "GAME FARM CONDITIONS" in the standard conditions

Conveying, moving or otherwise translocating a DEAD specimen - by using the following prohibited method and/or instrument namely: None

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Signature of Issuing Authority

25 April 2014

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Date of Signature

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(Up) Tel: 054-3322885 Fax: 054-3311155

## 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

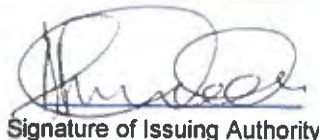
Process, prepare, cure, tan or treat in any manner whatsoever, to manufacture any article from such carcass or to mount or exhibit any article of such carcass - by using the following prohibited method and/or instrument namely: None

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.
- 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.

Page 3 of 7



Signature of Issuing Authority

25 April 2014

Signature of Permit Holder

Date of Signature

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## BYLAE 1 / ADDENDUM 1

### 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, klerrie, 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, flashing, 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.

#### GAME FARM CONDITIONS

Page 4 of 7



Signature of Issuing Authority

25 April 2014

Signature of Permit Holder

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 0936

(Upt) Tel: 054-3322885 Fax: 054-3311155



## BYLAE 1 / ADDENDUM 1

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 Hyenas. 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;

7.3) to sell the applicable species to a hunter.

Page 5 of 7



Signature of Issuing Authority

25 April 2014

Signature of Permit Holder

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

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(Upf) Tel: 054-3322865 Fax: 054-3311155

## BYLAE 1 / ADDENDUM 1

### 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 may 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 issues;
  - 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 recipient 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.
- 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..

Page 6 of 7



Signature of Issuing Authority

25 April 2014

Signature of Permit Holder

Date of Signature

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**BYLAE 1 / ADDENDUM 1**

ADDITIONAL PERMIT CONDITIONS APPLICABLE

None

Page 7 of 7



Signature of Issuing Authority

25 April 2014

Signature of Permit Holder

Date of Signature

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**Biodiversity**  
**Northern Cape Province**



Issued in terms of the provisions of: Regulation 28  
of the National Environmental Management Act:  
Biodiversity Act 10 of 2004: Threatened of  
Protected Species Regulations

SERIES

YEAR

Issued in terms of the provisions of: Section 39  
and 41 of the Nature and Environmental  
Conservation Ordinance 19 of 1974

**GAME FARM HUNTING PERMIT / PERMISSION**  
**PERSONAL EFFECTS PERMIT / PERMISSION**

**LANDOWNER / PERMIT HOLDER**

Jan Albertus Jacobus Pickard 5801105033084 - Physical Address: Ratelfontein Private Game Reserve - Postal Address: PO Box 84, Richmond, Northern Cape, 7090 Cape Town Western Cape Province 8000 RSA Home Phone: 0217946827 Mobile Phone: +27825698282 Fax N

**GAME FARM / FACILITY**

Ratelfontein Private Game Reserve

<b>(i) CLIENT</b>					
Hunting client full name					
ID or Passport number					
Physical address					
Vehicle Reg. Number					
<b>(ii) ARRIVAL</b>			<b>(iii) DEPARTURE</b>		
(dd/mm/yyyy)			(dd/mm/yyyy)		
<b>(iii) HUNTING OUTFITTER</b>			<b>(v) PROFESSIONAL HUNTER</b>		
Name		Name			
HC Number		PH Number			
Tel No.		Tel No.			
<b>(iv) HUNTING WEAPON</b>			<b>(vii) HUNTING METHOD</b>		
<b>(v) SPECIES HUNTED</b>	<b>NUMBER AUTHORISED</b>	<b>NUMBER ACTUALLY HUNTED</b>	<b>(vi) SPECIES HUNTED</b>	<b>NUMBER AUTHORISED</b>	<b>NUMBER ACTUALLY HUNTED</b>
<b>HUNTING PERIOD / ACTUAL DATE OF HUNTING</b>					
From	(dd/mm/yyyy)	To	(dd/mm/yyyy)		

**DECLARATION BY LANDOWNER / PERMIT HOLDER:**

- a) I hereby certify that the above mentioned hunter, legally hunted on the above mentioned farm or property, during the above mentioned period, the animal/s as specified in the table above.
- b) I hereby authorize the above mentioned hunter to buy, to remove, to convey or transport the carcass / specimen from the above mentioned farm or property, to his / her residential / physical address.
- c) I hereby donate / give the carcass / specimen to the above mentioned hunter / client.

Signature - Landowner / Permit Holder and Date

**DECLARATION BY HUNTER:**

I hereby take note of the following:

- a) that I can buy and hunt the above mentioned animals from the landowner.
- b) that I am allowed to field dress, process, and transport the carcass and to temporarily possess the dead specimen or derivative thereof, for a maximum period of 1 (one) year calculated from the day of the hunt.
- c) that I 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 issuing authority, in my province of residence, if still in possession of any carcass, derivative, part, specimen or trophy of the animal successfully hunted.
- d) that I will return the original "Game Farm Hunting Permit / Permission" together with my application for a possession permit.

Signature - Hunter and Date

Signature of Issuing Authority

25 April 2014

Date of Issue

Signature of Permit Holder

Date of Signature



# 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

May 24, 2018

**BOARD OF DIRECTORS:**  
JOHN J. JACKSON, III, J.D.  
CHRISSE JACKSON  
PHILIPPE CHARDONNET, D.V.M.  
SHANE MAHONEY  
RENEE SNIDER

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

RCVD JUN 01 2018

Re: Applications for Permits to Import Sport-Hunted Trophies

Dear Chief Cogliano:

Enclosed please find three applications for permits to import sport-hunted trophies:

- The first applicant is hunting a lion in Zambia with Mulimo Safaris. In this 3,600 km<sup>2</sup> concession in a Game Management Area (GMA), hunting revenues are used to pay scout salaries to protect the habitat and prey, and to fund community projects. The lion population and prey species are increasing due to the operator's anti-poaching. Patrols occur year-round, include a staff of >20, and average >\$50,000 per year in salaries, equipment, rewards, and other expenses. Poaching incidents have declined since this operator leased the concession. The operator also invests in education, healthcare, construction, water infrastructure, and more to improve the livelihoods of 1,000 people living in the GMA. Please see attached information from Mulimo Safaris and consider this information, and information in the DMA's files regarding the benefits of lion hunting in Zambia including information previously submitted by Conservation Force and Zambia's Department of National Parks and Wildlife (DNPW), in making a positive enhancement finding for this applicant.
- The second applicant is hunting a lion with Impanga Safaris in the Lumimba GMA in Zambia. This operator protects a 2,000 km<sup>2</sup> concession subject to a written agreement with the DNPW and the local Community Resource Board (CRB). Thirty-five percent of the concession fee and half the trophy fees are distributed to the CRB. These funds are used for wildlife protection and livelihood improvement. The operator pledges \$14,000 in projects to the CRB per year. Further, 80% of this operator's staff is from the local community. The operator also invests heavily in anti-poaching and recorded 283 patrol days in 2016. Scouts successfully arrested ten poachers, among other results. Please see the report from Impanga Safaris and consider this information, and information in the DMA's files regarding the benefits of lion hunting in Zambia including information previously submitted by Conservation Force and the DNPW, in making a positive enhancement finding for this applicant.
- The third applicant is hunting an elephant with Charlton McCallum Safaris (CMS) in Zimbabwe. We have previously provided extensive information about CMS and their anti-poaching unit, the Dande Anti-Poaching Unit (DAPU). Attached please find two recent DAPU reports. Please consider all information regarding CMS and DAPU, as well as the extensive information and responses to DMA information requests submitted by Zimbabwe's Parks and Wildlife Management Authority, 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

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](mailto:jjj@conservationforce.org)  
[www.conservationforce.org](http://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 Elephant.

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 elephant 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](mailto:jjw-no2@att.net)  
E: [regina.lennox@conservationforce.org](mailto:regina.lennox@conservationforce.org)

Signed: \_\_\_\_\_

(b)  
(6)

Name: \_\_\_\_\_

(b) (6)

Date: \_\_\_\_\_



RCVD JUN 01 2018

LB

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

Type of Activity

U.S. Fish and Wildlife Service  
Division of Management Authority  
Branch of Permits, MS: 1A  
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 Evans	1.b. First Name Milton	1.c. Middle Name/Initial (b) (6)	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) (b) (6)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address

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

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
3. Tax identification no.		2. 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 Waxahachie	1.c. State Texas	1.d. Zip code/Postal code (b) (6)	1.e. County/Province	1.f. Country USA
2.a. Mailing address (include if different than physical address, include name of contact person if applicable) (b) (6)				
2.b. City Waxahachie	2.c. State Texas	2.d. Zip code/Postal code (b) (6)	2.e. County/Province	2.f. Country 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)  <div style="display: flex; justify-content: space-between;"> <div>               (b) (6)           </div> <div>05/10/2018</div> </div>

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 on page 1

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

Milton (b) Evans  
(b) (6)

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.

Loxodonta Africana *African elephant*

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 Concession, (no nearby city)

b. Date wildlife is to be hunted:

05/17/2018 to 05/30/2018

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

Charlton McCallum Safaris, PH Myles McCallum

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:

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?

Daily rates of US \$1200.00 per day, trophy fee if successful of \$15,000.

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

Charlton McCallum Safaris provided local villages over 36,000 pounds of corn in March and April 2018 to compensate for crop destruction by elephants, to help prevent villagers from killing the marauding elephants.

**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: MA (b) (6) Evans Date: 5/10/18

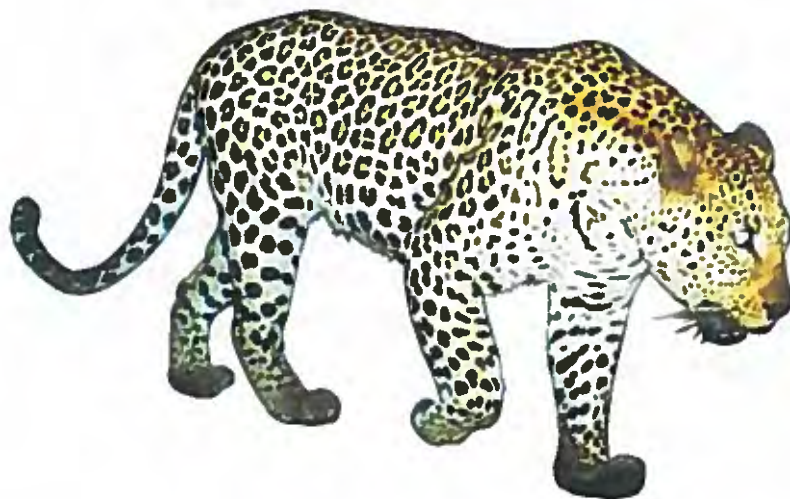
*Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain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

# DAPU End of year Newsletter 2017

Charlton McCallum Safaris

10 January 2018



**DAPU**  
DANDE ANTI POACHING UNIT

visit us at [www.dapuzim.com](http://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 Nondo

Harare, Zimbabwe  
10<sup>th</sup> January 2018

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## 1. Changes

As mentioned in previous reports, we have added Peter Solomon and Owen Zwiwanza to the management side of DAPU. Both go on patrols regularly in order to keep everyone honest.

CMS did a fair number of hunts in the Charara Safari Area in 2017 and we hope that we will continue with this into the future. Charara is a truly beautiful area with great promise and we have committed to a long-term plan for the area.

We had the one disciplinary issue in second period, and none other of any significance. Buzz and I feel that it is overdue for a one week re-training exercise for all DAPU scouts and supervisors and we hope to have this done by April 2018.

## 3. Peter Stewart fine art

Well known artist Peter Stewart has created the "DAPU collection"

<http://www.cmsafaris.com/dapu/DAPU-COLLECTION-2017.pdf>.

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 \*\*\*



\*\*\* Auction # 2 \*\*\*

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#### 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.

One of our goals in 2017 was to improve on fire management as a whole. Starting a bushfire in Zimbabwe is an offence and in 2017 we began treating it as such. Several arrests were made and lots of fines and warnings issued.

Whilst official government figures are yet to be released, we have no doubt what so ever that in Dande, hectares lost to fires in 2017 is the lowest in more than 10 years – in fact probably 20 years.

#### 5. Snaring & general poaching

September to end of December of 2017 was much, much quieter than the same period of 2015 and 2016. In terms of snares picked up and meat poachers arrested the yield is drastically reduced.

This is beginning to prove to be a motivational challenge for DAPU scouts – simply put - we have paid out less \$ in rewards. Buzz and I are now exploring ways to index work done to a reward or bonus system.

## 2017 first second, and third period baseline comparisons.

Month	No. of snares	Dogs shot	Meat Poachers convicted	Elephant poachers	Weapons retrieved	Rewards paid
January	71	0	3	0	2	US\$784
February	0	0	1	0	0	US\$150
March	7	0	0	0	0	US\$19
April	103	0	0	0	0	US\$133
	<b>181</b>	<b>0</b>	<b>4</b>	<b>0</b>	<b>2</b>	<b>US\$1,086.00</b>
May	9	0	0	0	0	US\$9
June	89	0	2	0	0	US\$118
July	19	1	2	0	0	US\$439
August	30	0	0	0	1	US\$48
	<b>147</b>	<b>1</b>	<b>4</b>	<b>0</b>	<b>1</b>	<b>US\$614</b>
September	139	0	0	2	1	US\$1,327
October	36	0	0	0	2	US\$68
November	99	0	0	0	1	US\$1,574
December	99	0	0	3	0	US\$0
	<b>373</b>	<b>0</b>	<b>0</b>	<b>5</b>	<b>4</b>	<b>US\$2,969</b>
<b>Total YTD</b>	<b>701</b>	<b>1</b>	<b>6</b>	<b>5</b>	<b>7</b>	<b>US\$4,669</b>

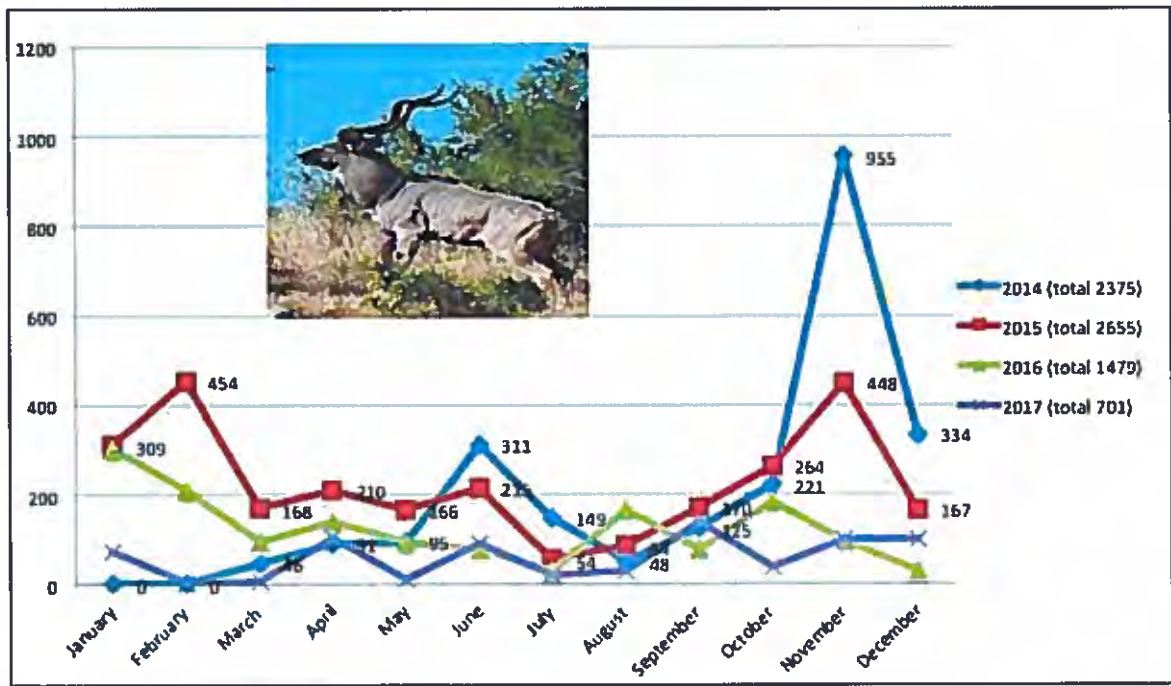
## 2016 first, second and third period baseline comparisons

Month	No. of snares	Dogs shot	Meat Poachers convicted	Elephant poachers	Weapons retrieved	Rewards paid
January	300	0	3	0	0	US\$821
February	208	0	0	2	0	US\$978
March	95	0	0		0	US\$97
April	137	0	1	0	2	US\$321
	<b>740</b>	<b>0</b>	<b>4</b>	<b>2</b>	<b>2</b>	<b>US\$2,217</b>
May	94	0	5	0	4	US\$1,310
June	75	0	0	0	0	US\$83
July	27	0	0	0	2	US\$67
August	164	1	0	0	0	US\$254
	<b>360</b>	<b>1</b>	<b>5</b>	<b>0</b>	<b>6</b>	<b>US\$1,714</b>
September	78	0	0	0	1	US\$97
October	181	0	1	0	1	US\$447
November	92	0	2	0	0	US\$442
December	28	0	0	0	0	US\$532
	<b>379</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>2</b>	<b>US\$1,518</b>
<b>Total YTD</b>	<b>1479</b>	<b>1</b>	<b>12</b>	<b>2</b>	<b>10</b>	<b>US\$5,449</b>



One of the most pleasing things about these trends is that we are getting on top of the “spikes” in poaching. DAPU has worked smarter and harder at the right time, in the danger areas, to counter increased poaching.

### 2015, 2016 and 2017 Full year snare yields compared



### 5. Elephant poaching

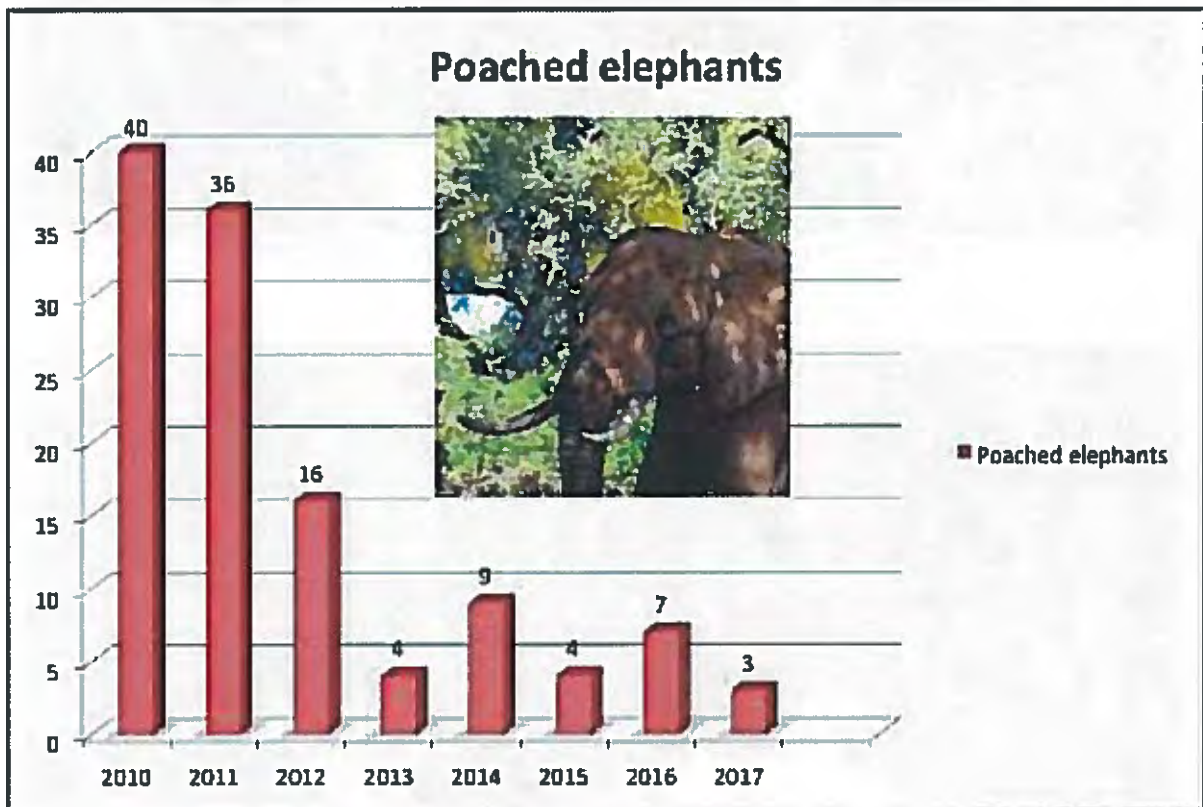
There were NO elephants poached in the third period of 2017 in the whole of Dande North and East. Therefore with the two lost in the Iira area (ward 2) and one in Chapoto (ward 1) we lost a total of three elephants in 2017. This is a figure that we can be extremely proud of. Obviously zero losses would be even better, but, considering Dande has + 100km's of border with Mozambique and a further 12km's with Zambia... probably we should be very happy indeed.

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It must be mentioned that two elephant poachers were arrested and convicted in September and a further three in December 2017. One x AK47 taken out of circulation. We had heard about this AK47 for years and it was especially good news to get this weapon out of the system.

Traditionally as the hunting season slows down, and the presence of hunters also decreases – elephant poaching increases. The most dangerous months for our elephants are January – April, so we will need to be extra vigilant over the next few months until our hunters come back and help us out!



\*\*\* Graph showing 8 year elephant carcass count\*\*\*

End of year 2017



*\*\*\* Parks, DAPU and the Accused (later "the guilty")\*\*\**



*\*\*\*Bongi with seized ivory N.B. it all looks old ie they were "picked up" – not freshly poached.\*\*\**

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## 7. Problem Animal Control

Duties for DAPU scouts also include attending to Problem Animal reports (PAC). Obviously “the peak season” for PAC is the cropping season. That said there are cases all year long.

### 7.1.1 Elephant

None shot in 2017 BUT there have been and will always be sporadic raids by (mostly) young bulls into riverside vegetable gardens and fields. We treat every report as serious and the DAPU teams really react as strongly as they can early on. This normally saves us shooting. Our DAPU crews go onto full time elephant PAC rosters from February through to the end of April.

### 7.1.2 Lion

One old lioness killed and ate an old man from Kanyemba. He was on his way to the Zambezi to go fishing for his family. The very unfortunate scene was attended to by DAPU and she was shot, close to where she killed. Sporadic killing of livestock persists especially in ward 4 (8 cattle killed in November / December - but no lions shot in that area.



End of year 2017



\*\*\* Skin and bones\*\*\*



\*\*\* This picture clearly shows the tooth wear –she is an old cat\*\*\*

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### 7.1.3 Buffalo

Only the one blind old buffalo cow in Pedza villages was destroyed. Buffalo spend allot of time in the villagers gardens at night – normally the villages chase them or fence of gardens as required. In the rainy season they love to eat corn and cotton, which is grown in bigger fields, so that is more problematic as they cannot be fenced.

### 7.1.4 Crocodile

No one killed or injured that we know of.

### 7.1.5 Hippo

Hippos continue to generally make a nuisance of themselves along the Mwantanda River in ward 1 and in ward 16 (where the Manyame comes into the Zambezi Valley). Two badly behaved hippo were shot in March by Council but that was all.

### 7.1.6 Snake bites

Nothing to report.

## 8. Netting on the Zambezi

DAPU will continue to contribute 200 liters of petrol per month toward efforts to eliminate all illegal fishing in a 50km stretch of the Zambezi River. In 2017 National Parks achieved the following:

8	Banana boats.
10	Makoros.
14,340m	Nets burnt.
6	Basket traps.
33	Arrests.
19	Escaped.

Only when we added up the season's haul of nets, boats and poachers did we realize:

1. The scale of the problem.

2. How much work the National Parks crews have done.

We estimate that 85% of all illegal Netting has been stopped. Fisherman reported much improved catches as a whole, with lots of small tiger and bream caught – this can only bode well for all parties in the future.

Obviously lots of illegal fisherman also lay snares and much worse, so this effort is well worth supporting. Please see attached a separate report from National Parks.



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\*\*\*Measuring nets – note the fine gauge \*\*\*



\*\*\*Fish traps – Zambezi River 2017\*\*\*

(Funnily enough large gauge holes & eco friendly - just placed in wrong country!

## 9. Goals for 2017

1	Continue with anti-poaching patrols	Patrols have done well - we have had the quietest year in our history.
2	Early burning will start in May as soon as it is dry enough.	Complete – our most intensive effort in 8 years and surely best in 20 years.
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\*\*\*

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\*\*\* 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](http://www.conservationforce.org)

visit us at [www.dapuzim.com](http://www.dapuzim.com)

## 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 Grobelaar – 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
Communitas 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
	<b>US\$54,960</b>
<hr/>	
<b>2017 Hunting clients levies and contributions.</b>	<b>US\$13,116</b>
<hr/>	
<b>Charlton McCallum Safaris</b>	<b>US\$45,540</b>
<hr/>	
<b>Total Income</b>	<b>US\$113,616</b>

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## Charlton McCallum Safaris | Dande Anti-Poaching Unit

### Expenses

#### # 1 Wages, rewards and rations.

	<u>Game</u>	<u>Management</u>			<u>Fish poaching</u>	
	<u>Scouts</u>	<u>Bongl, Muno</u>	<u>Rations</u>	<u>Rewards</u>	<u>(ZAPP)</u>	<u>Total</u>
		<u>Alfa &amp; Owen.</u>				
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
	<b>US\$14,300</b>	<b>US\$20,865</b>	<b>US\$10,360</b>	<b>US\$4,703</b>	<b>US\$3,000</b>	<b>US\$53,228</b>

#### # 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 Harrison's Aimguard shotguns x 6	US\$3,450
Uniforms	US\$2,684.00
Toyota Hilux	US\$27,150.00
	<b>US\$42,125.00</b>

#### # 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
<b>Total</b>	<b>US\$18,263</b>

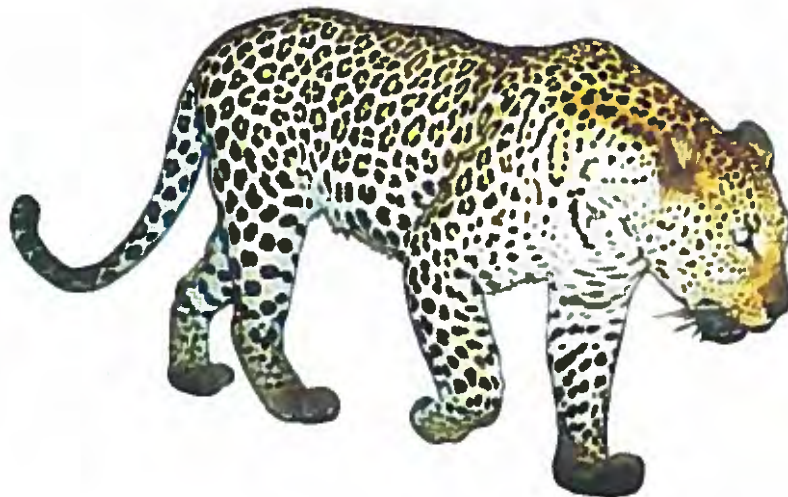
<b>Total expenses</b>	<b>US\$113,616</b>
<b>Total Income</b>	<b>US\$113,616</b>
<b>Shortfall / Credit</b>	<b>US\$0</b>

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# DAPU First Period Newsletter 2018

Charlton McCallum Safaris

02 May 2018



**DAPU**  
DANDE ANTI POACHING UNIT

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Dear Friends,

Thank you all so much for your unwavering support. DAPU has gotten off to a strong start in 2018. I must say that it has been a different "season" in that it almost seems like the lions and elephant's have declared war on the villagers. We cannot remember a season with quite this intensity of conflict and tragedy.

Summarily, DAPU scouts have all been posted to their home camps (the DAPU camp in the area which they come from) so that they are able to react strongly to any PAC. Our reasoning (which is correct) is that the scouts will work hardest in their home villages protecting lives and crops. When the crops are safely harvested we will begin once again to mix the units so that no one works in their home ward.

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  
02<sup>nd</sup> May 2018

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## 1. Changes

As mentioned in previous reports, we have added Peter Solomon and Owen Zwiwanza to the management side of DAPU. In the PAC season (which is especially dangerous), Bongi, Muno, Peter and Owen all go on regular patrols in order to keep everyone honest and safe.

Ward 1 (Kanyemba) has decided to retrench all six of their DAPU scouts as of 1<sup>st</sup> April 2018 for reasons of their own. Buzz and I have had to let the process play out in the hope that in the end we will achieve some capacity building i.e. all Wards need to be more responsible for their wildlife, which obviously includes having some control of their own scouts. Ultimately DAPU was created to support the ward scouts – which it continues to do very successfully indeed.

The decision has caused some confusion for sure, and we think has been a warning to other wards not to act too hastily!

The outcome is that six new scouts have been hired, and are awaiting training before deployment in June. Bongi, Muno and Owen have personally been doing all the patrols on their own so that no enforcement gaps appeared.



Two homemade muzzleloaders picked up in April.

## 2. Peter Stewart fine art

Peter is a young contemporary painter who has who has developed a reputation for his highly representational art. Growing up in South African bush he became interested in the wildlife from an early age. He has a deep respect for the knowledge and sensitivities of the past and has spent time visiting museums as well as establishing relationships with contemporary realist painters in the USA. His paintings emote, and convey a care and sensitivity that is only achieved from knowing the subject matter intimately. Utilising subtle value and temperature shifts, fine draughtsmanship and pure intuition, Peter weaves a world of breathable air and tactile forms.

Peter Stewart has painted "The Warrior"– (16 x 24 inches) on Belgian canvas in support of DAPU. The male lion is the king of beasts, the top of the food chain and the most dominant force in the African Bush. Male lions are viewed as this majestic, regal creature that is protector, a father and warrior. The one that will put his life on the line for the pride.



This painting is on sale through <http://dapuzim.com/support.html>

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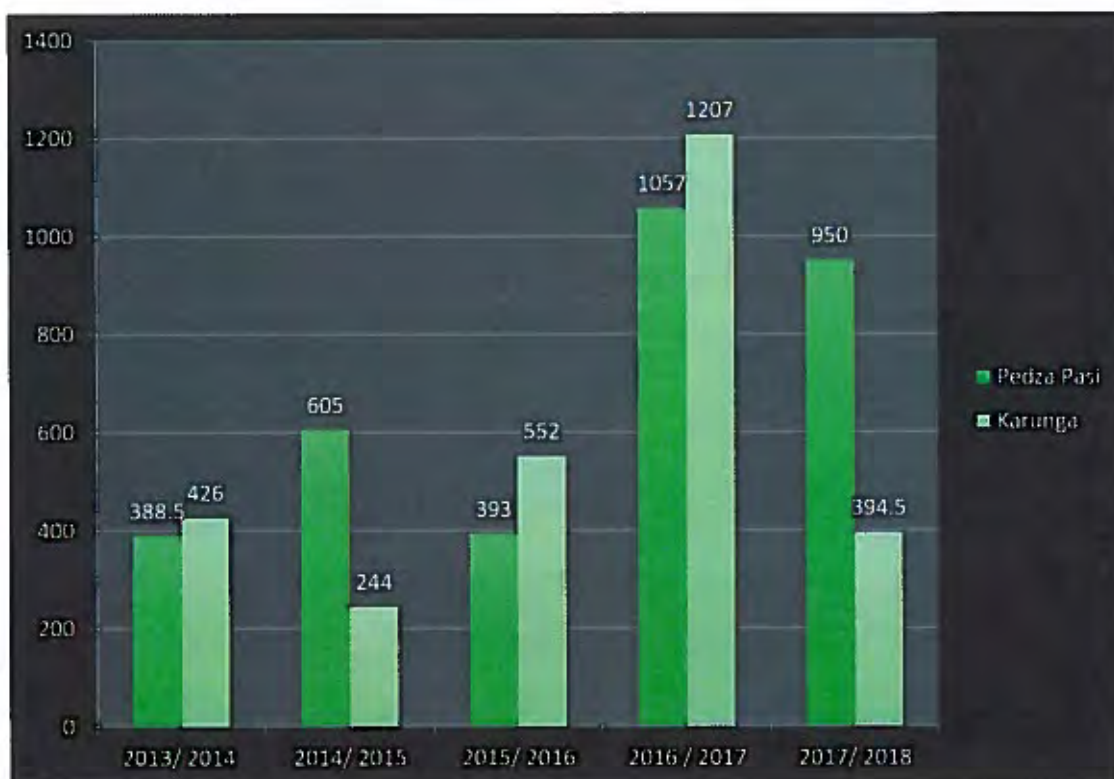
### 3. The wet season. "Rain, crops, and poaching"

The 2018 rainy season has been erratic and late. The crops – have in general been very poor in Dande, so there is no doubt that we can expect heavy poaching September 2018 – March 2019. There was decent late rain in March and April so there will be a small harvest, but certainly not enough to see families through the year.

This is a reminder to us all that Dande:

- a. Is in "agro ecological region 5" which is at best marginal for agriculture BUT is perfectly suited to wildlife.
- b. Wildlife needs water in some areas, so especially, in the East (and in ward 1) we need to re double our efforts, at getting water. Some rivers systems are now settled by people, leaving game competing with humans for water – which typically does not work well!!!

#### Seasonal rainfall.



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The ward 1 (Kanyemba community) was really hard hit by NO rain until February, followed by floods, so crop loss was close to 100%. They drew down on 2018 hunting proceeds, in order to purchase 30kg of mealie meal for each of the 1,125 families and 33,750kg's was subsequently delivered. Obviously stories like this are extremely important in the big picture and help DAPU's efforts immensely.



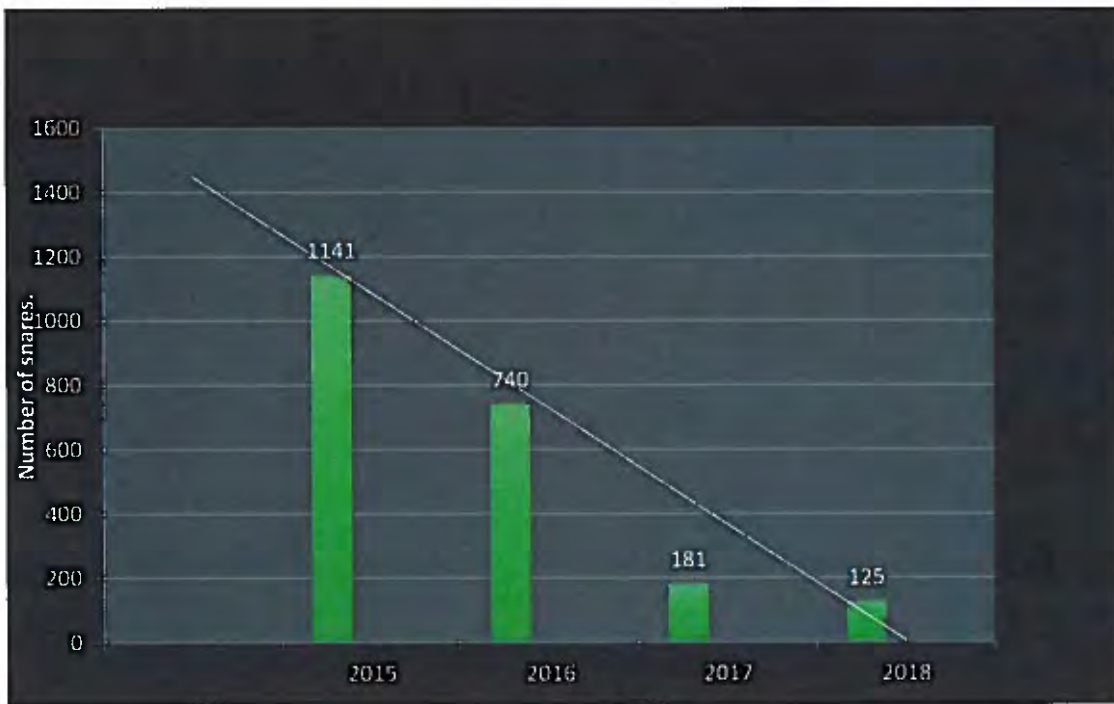
#### 4. Snaring & general poaching.

January to end of April 2018 has been much, much quieter than the same periods in 2014, 2015, 2016 and 2017. In terms of snares picked up and meat poachers arrested the yield has been drastically reduced. Buzz and I are of course thrilled and believe the reasons to be a combination of the below:

- a. DAPU.
- b. Buy into our programs from communities.
- c. Equitable sharing of income.
- d. Government of Zimbabwe.
- e. Employment.
- f. Meat distribution.

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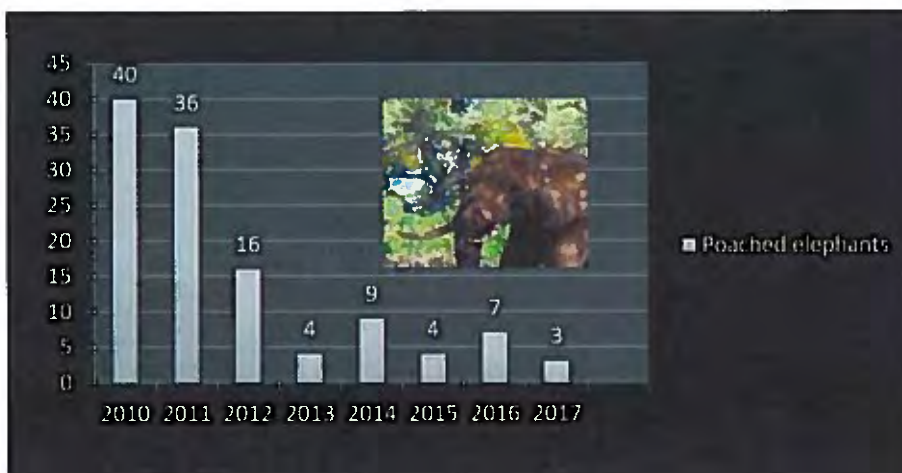
### Snares - 2014, 2015, 2016, 2017 and 2018 first period baseline comparisons



### 5. Elephant poaching.

There are NO CONFIRMED reports of elephants poached in Dande thus far in 2018, BUT we have had reports of shots in the Irira area, so we know for sure that we will be picking up a carcass or two in that area.

An exceptional National Parks Investigations officer (with a little help from DAPU) was able to make two arrests in Dande this year.



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26<sup>th</sup> March 2018

*"One accused male, aged 29 married with 3 wives and 6 kids. Recovered 1 x elephant tusk weighing 11.6kg valued at \$2900 and 1 x fake wooden carved tusk".*

*Later sentenced to 9 years imprisonment.*







20<sup>th</sup> April 2018

The above believed to be from an elephant cow poached in Ward 1 in January 2018. The accused is now the "convicted" – he is a repeat offender and is currently serving out his 9-year term.

## 6. Cyanide poaching

DAPU assisted National Parks to arrest a man selling cyanide to poachers. He was tried and pleaded guilty and sentenced to 12 months in jail which is the maximum sentence allowed.

This case has links back to a case where 3 years ago DAPU arrested a poacher who killed a warthog by poisoning it with cyanide. The below was his supplier. The net eventually closes!

We must compliment the investigations from National Parks - they are doing a fantastic job and poaching has been taken very seriously. It has been a pleasure for DAPU to help in these arrests.

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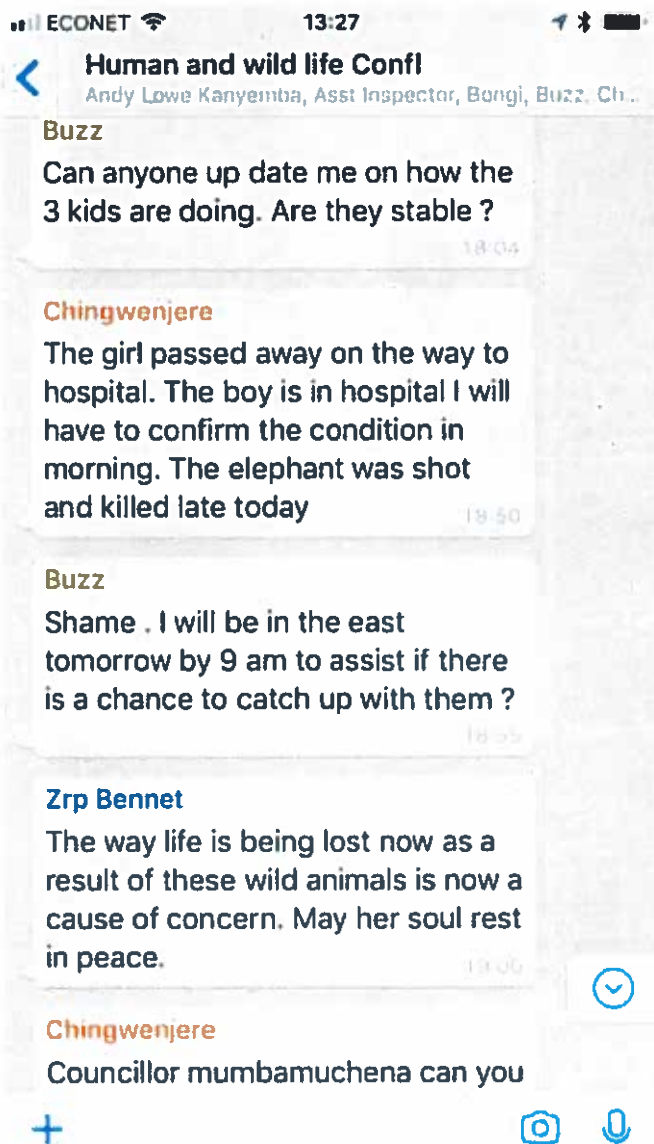
## 7. Problem Animal Control

Duties for DAPU scouts also include attending to Problem Animal reports (PAC). Obviously “the peak season” for PAC is the cropping season. The

### 7.1.1 Elephant.

Two people (kids killed), two people hospitalized and two elephants shot in 2018. Our DAPU crews have been on full time elephant PAC rosters from February through to the end of April, and look to continue into May.





A screen shot of our Human wildlife conflict Chat group. Every single day February to end of April we have had incidents to attend to.



A nine-year-old boy, died trying to protect his families fields.



This is what 100% crop loss looks like.

#### 7.1.2 Lion

Four lions shot after communities lost 64 sheep (in one night), 12 goats and 24 cattle to these cats. With the trophy bans and resultant loss of incomes to communities, attitudes have hardened.



#### 7.1.3 Buffalo

No reported serious problems to date in 2018.

#### 7.1.4 Crocodile

No one killed or injured that we know of so far in 2018.

#### 7.1.5 Hippo

One hippo was wounded (muzzle loader) and had to be shot. Hippos continue to generally make a nuisance of themselves along the Mwantanda River in ward 1 and in ward 16 but Muno and Owen have been able to keep them at bay.

#### 7.1.6 Snakes

Nothing to report.

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## 8. Netting on the Zambezi

DAPU will continue to contribute 200 liters of petrol per month toward efforts to eliminate all illegal fishing in a 50km stretch of the Zambezi River. Due to heavy rains, and flooding, in February and March, netting has been slow. We expect that illegal netting will pick up soon.

## 9. Goals for 2018

1.	Continue with anti-poaching patrols	Patrols have done well - we have had the quietest year in our history.
2.	Early burning will start in May or June, as soon as it is dry enough.	.
3.	Schedule re – training of scouts.	Anytime June to August.
4.	2018 uniforms and boots – paid for not delivered.	
5.	If possible trade in one of the older DAPU vehicles for a newer one.	
6	Install second solar pump in East by end of May.	
7.	Carry out leopard and lion survey – buy 10 more trail cams.	
8.	Sell two old tractors and get one new one (vital for new pipelines, firebreaks amongst other things)	Done.
9.	6 new GPS's required preferably with sat tracking.	

## 10. Other News

Myles was invited to Seville in Spain to make a presentation to experts, scientific authorities, governments and NGO's on:

*"The best management practices in hunting and the role of Professional Hunters in Conservation"*

It was a four day workshop and it's aim, was in particular, to foster close collaboration between Scientific Authorities from both exporting and importing countries in relation to the formulation of CITES Non-Detriment Findings (NDFs) for hunting trophies of certain African species.

Certainly one of the primary reasons Charlton McCallum Safaris was invited was because of DAPU and the success that it has enjoyed!



*"I think I am less nervous facing a wounded buffalo!"*

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## 11. Dallas Safari Club – Foundation – Land cruisers



DAPU # 1



DAPU # 2

Due to an extremely generous \$24,000 donation from the Lubbock Sportsman's Club via the Dallas Safari Club Foundation, Buzz and I were able to purchase a new Toyota Hilux, which has allowed us to dedicate two more suitable land cruisers 100% full time to DAPU. The Hilux will do both DAPU and general duties.

visit us at [www.dapuzim.com](http://www.dapuzim.com)



## 11. Flying for wildlife and others

We must also extend our profound 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. Richard Tennant, Hannes Scholtz and Edward Whitfield have all given extremely generously of their time and machines to DAPU.

*"A huge thanks to FLYING FOR WILDLIFE and Edward Whitfield who came down to the Dande to help DAPU fly the complete area looking for any signs of poaching.*

*Ed is a wonderful pilot and his Savannah was a real eye opener. What we achieved in 7 hours of flying was incredible. I am happy to say that from what we can see the area is nice and quiet. We did see some fish poachers based in the Irira area. These are the Vadoma people and it is part of their culture. There are times that one should turn a blind eye, which is what we did. There was an old elephant carcass from well over a year ago that we were not aware of.*

*We did see a lot of elephant buffalo was well as some impala zebra bushbuck and sable despite the very thick bush. Once again a huge thanks to Ed as well as FLYING FOR WILDLIFE- if any organisation deserves financial support then FFW certainly do as they do an amazing job and are becoming essential in the controlling of poaching in remote areas"*



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2. 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!

3. 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.



A nice looking solution – GPS, and satellite Text messages for game scouts. They can send distress calls and we can also track their patrols.

## 12. 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](http://www.conservationforce.org)

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## DAPU Income and Expenses 2018 (first period)

### 2018 income

Myron and Dana Repka	US\$100	
Graham George	US\$2,000	(auction painting)
David Adams	US\$5,000	
Jared Bachmann	US\$500	
Julie Cambuzzi & John Peters	US\$300	
Jytte Mejnertsen	US\$600	
<b>Total</b>	<b>US\$8,500</b>	

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<b><u>Charlton McCallum Safaris</u></b>	<b>US\$23,035</b>
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<b><u>Total Income</u></b>	<b>US\$31,535</b>
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### 2018 Expenses

#### # 1 Wages, rewards and rations.

	<u>Game</u>	<u>Management</u>			
	<u>Scouts</u>	<u>Bongi</u>	<u>Muno &amp; Alfa</u>	<u>Rations</u>	<u>Rewards</u>
					<u>Total</u>
January	US\$1,100	US\$1,605	US\$770	US\$63	US\$3,538
February	US\$1,100	US\$1,605	US\$770	US\$33	US\$3,508
March	US\$1,100	US\$1,605	US\$770	US\$556	US\$4,031
April	US\$800	US\$1,605	US\$560	US\$966	US\$3,931
	US\$4,100	US\$6,420	US\$2,870	US\$1,618	US\$15,008

#### # 2 2018 DAPU equipment expenses

Ammunition (12 guage)	US\$1,062.26
AAX 9832 repairs	US\$2,755.00
ABK 7074 repairs	US\$322.00
Tires x 6	US\$1,560.00
Uniforms	US\$3,485.00
Overalls x 50	US\$1,000.00
Leighfields (radio repairs)	US\$184.00
	<b>US\$10,368.26</b>

#### # 3 Vehicles (2).

AAX 9832 = 5,295.00 km x \$0.5 x km	US\$2,648
ABX 7074 = 7023km x \$0.5 x km	US\$3,512
	<b>US\$6,159</b>

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<b><u>Total expenses</u></b>	<b>US\$31,535</b>
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<b><u>Total Income</u></b>	<b>US\$31,535</b>
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Department of Interior  
U.S. Fish and Wildlife Service  
**Federal Fish and Wildlife Permit Application Form**

RCVD JUN 01 2018

Type of Activity

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 <b>Abbott</b>	1 b. First Name <b>Marsha</b>	1 c. Middle Name/Initial <b>(b) (6)</b>	1 d. Suffix
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>(b) (6)</b>				
1 b. City <b>McGehee</b>	1 c. State <b>Arkansas</b>	1 d. Zip code/Postal code <b>(b) (6)</b>	1 e. County/Province	1 f. Country <b>USA</b>
2 a. Mailing address (include if different than physical address; include name of contact person if applicable) <b>(b) (6)</b>				
2 b. City <b>McGehee</b>	2 c. State <b>Arkansas</b>	2 d. Zip code/Postal code <b>(b) (6)</b>	2 e. County/Province	2 f. Country <b>USA</b>

**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 <i>Title 50 Part 13 of the Code of Federal Regulations</i> and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.	
<b>Marsha Abbott</b> Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures)	<b>05/18/2018</b> 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](mailto: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, Chanzuzi 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: Maria 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).







# 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 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 17<sup>th</sup> 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<sup>2</sup> of wildlife area (average 189 km<sup>2</sup> 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<sup>2</sup> (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<sup>2</sup> (approximately 10,000 km<sup>2</sup> 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<sup>2</sup> (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 of 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 unsustainable 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 and 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 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 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 undertaken 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.

  
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Branch of Permits  
Division of Management Authority

  
Mary Coglian, Chief  
Branch of Permits  
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Zambia Department of National Parks and Wildlife (DNPW). May, 5th, 2016. Enhancement and Non-Detriment Finding for African Lion sport Hunting in Zambia Completed by the Department of National P Parks and Wildlife (DNPW).



**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  
BRANCH OF PERMITS, MS: IA  
5275 LEESBURG PIKE  
FALLS CHURCH VA 22041-3803

*Mary Coghlan*  
CHIEF, BRANCH OF PERMITS, DMA

**Permittee:**

MARSHA (b) ABBOTT  
(b) (6) (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.

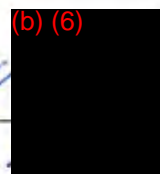
I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

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: \_\_\_\_\_



(b) (6)



Name: Richard Papapietro

(b)  
(6)

Date: \_\_\_\_\_

5/15/17



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

Type of Activity

U S Fish and Wildlife Service  
Division of Management Authority  
Branch of Permits, MS 1A  
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 Papapietro		1 b. First Name Richard		1 c. Middle Name/Initial (b) (6)	1 d. Suffix
2. Date of Birth (mm/dd/yyyy) (b) (6)	3. Telephone Number	3 a. Alternate Telephone Number			

**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)			
Henderson	NV	1 d. Zip code/Postal code (b) (6)	1 e. County/Province (b) (6)
1 f. Country USA			
2 a. Mailing address (include if different than physical address, include name of business/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. The information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that the information herein may subject me to the criminal penalties of 18 U.S.C. 1001.	
Signature of applicant/Principal Officer for permit (No photocopies)	Date of signature (mm/dd/yyyy) 05/15/2017

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. (b) (6)

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  
Operator Enhancement Questionnaire

v.5/3/18

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 km<sup>2</sup>: 3600
  - a. Land tenure: ☐ Government lease ☒ Community ☐ Private ranch ☐ Private conservancy
  - b. Length of concession agreement: 10 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:  
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:<sup>1</sup>

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	<u>1</u>	<u>1</u>

<sup>1</sup> 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?"



**Conservation Force  
Operator Enhancement Questionnaire**

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Trackers	2	2
Anti-poaching scouts/rangers	18	18
Other anti-poaching		
Cooks/housekeepers	1	1
Community coordinators	2	2
Managers		
Biologists		
Others: <u>GENERAL STAFF</u>	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:<sup>2</sup>

- a. Number of anti-poaching staff: 4.20
- 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 / MORNINGS
- 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 \$	23,000 \$	
Equipment		15,000 \$	10,000 \$	
Vehicles		10,000 \$	15,000 \$	
Petrol		2,000 \$	4,000 \$	

<sup>2</sup> 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**

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Rewards paid		10000	5000	
Other:				
Other: <u>High 1st meal</u>			3000	
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:<sup>3</sup>

- Does the company contribute money or goods/services to local communities? ☒ Yes ☐ No
- 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.
- Does the company provide game meat to nearby communities? ☒ Yes ☐ No
- If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: 50%.
- 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
- 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				

<sup>3</sup> 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."

**Conservation Force  
Operator Enhancement Questionnaire**

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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: <u>Anti-enforcement</u>		\$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%	80%

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

Conservation Force  
Operator Enhancement Questionnaire

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improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare that the foregoing is true and correct.

Signature: 

Name: Ahmed Ali Title: Manager







# 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) (6) 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 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 17<sup>th</sup> 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<sup>2</sup> of wildlife area (average 189 km<sup>2</sup> 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<sup>2</sup> (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<sup>2</sup> (approximately 10,000 km<sup>2</sup> 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<sup>2</sup> (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 of 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 unsustainable 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 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 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 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 undertaken 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.

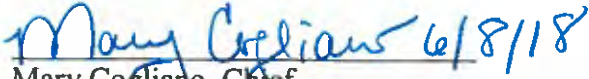
Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to him to successfully accomplish 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 Coglianò, Chief  
Branch of Permits  
Division of Management Authority

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**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 Coglian*  
CHIEF, BRANCH OF PERMITS, DMA

**Permittee:**

RICHARD (b) (6) PAPAPIETRO (b) (6)  
(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).



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

OMB No 1018-0164  
Expires 11/30/2016

**Federal Fish and Wildlife Permit Application Form**

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

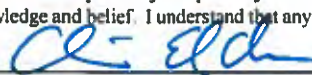
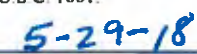
Type of Activity:  
Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros

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 (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Occupation	4. Affiliation/ Doing business as (see instructions)	
5.a. Telephone number (b) (6)	5.b. Alternate telephone number	5.c. Fax number	5.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 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.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.   Signature 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 OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: 1 (Import is limited to two per hunter per calendar year)  
**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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 & West Petauke Game Mgmt Areas, Nyimba being closest town, operators and lease holders Nyamvu & Mopane Safaris Ltd.

- b. Date wildlife is to be hunted:

July 27,2018 - August 17,2018

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

All parts including skin, teeth, skull, and claws

3. **IF THE ANIMAL IS DEAD**, please enter the following:

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

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 document]:

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 appear on the face of the export permit].

Name: Business      Michael Borman  
Name: Address:      Bangweulu Taxidermy  
Address:              4142K Chifwema Road, New Kasama  
City:                   Lusaka  
State/Province:      Southern Zambia  
Country, Postal Code: 50100

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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, range state authorities, safari hunting 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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one 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.*

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 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):

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):

Applicant or John J. Jackson, III or Regina Lennox of 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.





RCVD MAR 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 of Southern  
African Leopard and Namibian Southern White  
Rhinoceros**

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 <b>CARTER</b>	1.b. First Name <b>HOWARD</b>	(b) (6)	1.d. Suffix
2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	4. Alternate Telephone Number	5. 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. (b) (6)				
1.b. City <b>Weatherford</b>	1.c. State <b>TEXAS</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>
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)	
<b>(b) (6)</b>	<b>02/28/2018</b>
Please continue to next page	

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one. *N/A*

**Note 2:** 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. *N/A*

**Note 3:** *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 4:** Certain hunting trophies, including leopard 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.

- Complete all questions on the application.
- Mark questions that are not applicable with "N/A".
- If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.
- 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.

*Please send via Enclosed fed ex. to the name and address listed on page 1.*

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

*Howard* (b) (6) *Carter or*  
(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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

- a. Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20.
- b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia  
Quantity:        (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).

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 ANIMAL HAS ALREADY BEEN TAKEN, please enter the following:

- d. 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:

Farm Okanjanga #54, Okahandja District  
Namibia

- e. Date wildlife is to be hunted: Sept. 21, 2017



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

Mr. Jacobus Blaauw

- g. 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]:

Brakwater Plot #43, Windhoek, Namibia

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 Permit: 174392

Tag No. NAPP 193/250 2017

See attached copy of Hunt Permit

8. Complete name and address of overseas person or business shipping the trophy to you.

- a. 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. Jacobus Blaauw

Business Name:

Address: Box 11908

Address:

City: Windhoek

State/Province:

Country, Postal Code: Namibia, 9000

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. 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: \_\_\_\_\_ N/A \_\_\_\_\_ Date: \_\_\_\_\_

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



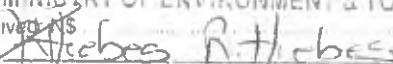
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Applicant's signature:

(b) (6)  Date: 03/28/2018

*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.*

11. 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>MINISTRY OF ENVIRONMENT AND TOURISM</b> Directorate Scientific Services Private Bag 13306 Windhoek, Namibia Enquiries: Chief Warden, Permit Office			<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">PERMIT No.:</td> <td style="text-align: center;">174392</td> </tr> <tr> <td>VALID FROM:</td> <td style="text-align: center;">07.09.17</td> </tr> <tr> <td>VALID TO:</td> <td style="text-align: center;">23.09.17</td> </tr> </table>	PERMIT No.:	174392	VALID FROM:	07.09.17	VALID TO:	23.09.17																																																																																																									
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<b>IMPORTANT: This permit is not valid if altered in any way</b>																																																																																																																		









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: 1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

**Type of Activity:**

Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros

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 <b>SWANSON</b>	1.b. First name <b>ERIC</b>	1.c. Middle name/initial <b>(b) (6)</b>	1.d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Social Security No. <b>(b) (6)</b>	4. Occupation <b>(b) (6)</b>	5. Affiliation/ Doing business as (see instructions)
6.a. Telephone number <b>(b) (6)</b>	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		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>(b) (6)</b>			
1.b. City <b>Leewood</b>	1.c. State <b>KS</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.f. Country <b>U.S.A</b>
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)			
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province
2.f. Country			

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <b>(b) (6)</b> <b>Eric Swanson</b> Signature (_____) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) <b>5/26/2018</b>

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**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 were 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:** The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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 handcraft 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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

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, horns, tusks).
3. **IF THE ANIMAL IS DEAD**, please enter the following:
  - a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: Bulye Valley Conservancy, Masvingo Province, Zimbabwe
  - b. Date wildlife was hunted:

1st September 2017

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from . 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 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):

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):

Ed. (b) (6) SWANSON (b) (6)  
(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.

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

Full mount skin including the claws and the 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 document]:

TROPHY CONSULTANTS INTERNATIONAL, 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 appear on the face of the export permit].

Name:

Business Name: TROPHY CONSULTANTS INTERNATIONAL

Address: 4 JOSIAH CHINAMANO ROAD

Address: BELMONT

City: BULAWAYO

State/Province: ZIMBABWE

Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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:** 5/26/2013

*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.*





**FROM:**

Frank (b) (6) Spencer

(b) (6)

El Paso, TX (b) (6)

RCVD JUN 08 2018

**TO**

U.S. FISH & WILDLIFE SERVICE – HEADQUARTERS

ATTN: Division of Management Authority – Branch of Permits

MS: IA

275 Leesburg Pike

Falls Church, VA 22041-3803

Attached are applications to amend and replace Permit US1755670C/9.

Please feel free to contact me if you have any question regarding this request. I can be reached at

(b) (6)

Thank you!

If you are requesting an amendment to an issued permit that is still valid, then please submit application form 3-200-52.

If you are requesting a replacement for an issued permit that is still valid, then please submit application form 3-200-66.

If you are requesting an amendment to an issued permit that is still valid and has also been lost, then please submit application form 3-200-52, and page two of application form 3-200-66.

On your cover letter please explain what you are requesting so that both the data entry staff and the LIE are clear for what you are applying.

If the permit has expired, has been lost, and you need to amend the permit, then please submit application form 3-200-52, and in your cover letter explain that the permit has both expired and been lost.

Respectfully,

George D. Villavicencio

---

George D. Villavicencio, J. D.  
Supervisory Policy Specialist  
U.S. Fish & Wildlife Service - Headquarters  
Attn Division of Management Authority - Branch Of Permits  
MS: IA  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
703-358-2483 (Telephone)  
703-358-2280 (Facsimile)  
Jorge\_Villavicencio@fws.gov

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On Tue, May 8, 2018 at 3:32 PM, Meehan, John <[John.Meehan@mig.com](mailto:John.Meehan@mig.com)> wrote:

Hi can you please confirm form number that should be submitted for a lost permit as well that it must be amended to change the address in box 4 for the foreign name & address.

I am not sure if we use 66 or 52 or both.

Thanks in advance

JJ

LB



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

OMB No 1018-0093  
Expires 05/31/2017

RCVD JUN 08 2018

# 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 SPENCER	1 b First name FRANK	1 c Middle name or initial (b) (6)	1 d Suffix (b) (6)
2 Date of birth (mm/dd/yyyy) (b) (6)	3 Social Security No. (b) (6)	4 Occupation (b) (6)	5 Affiliation/ Doing business as (see instructions) (b) (6)
6 a Telephone number (b) (6)	6 b Alternate telephone number (b) (6)	6 c Fax number (b) (6)	6 d E-mail address (b) (6)

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

C. All applicants complete address information			
1 a Physical address (Street address; Apartment #, Suite #, or Room #, no P.O. Boxes) (b) (6)			
1 b City EL PASO	1 c State TEXAS	1 d Zip code/Postal code (b) (6)	1 e County/Province (b) (6)
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 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 <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 17US55670C/9 No <input type="checkbox"/>
3	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) _____ Date of signature (mm/dd/yyyy) 05/31/18

**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 17US55670C/9.
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: \_\_\_\_\_

- 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: 05-21-18

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.



RE: Form 3-200-52

Pg: 3 of 10

Section b

**Request to change the country of shipper to the address below:**

EMIAC MOZ LDA

COMPLEXO TEXTAFRICA

BARRIO DA SDALPO CHIMOIO MOZAMBIQUE

Permittee's Signature:



Date:

05/31/16

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

FRANK (b) SPENCER

(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.

**E. REPLACEMENT DOCUMENT (CITES/ESA/MMPA/WBCA/LACEY ACT)**

**NOTE 1:** Use this application to request a replacement document if your currently valid permit has been lost or misplaced (for this application, all permits, registrations, and certificates are referred to as a permit).

**NOTE 2:** The application **must** be submitted to the office that issued the initial permit.

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 submit, indicate the application question number you are addressing.

1. Identify the permit number (found in the upper right corner) of the permit needing replacement, if known:  
US1755670C/9
2. Current location of specimen (include address and country):  
EMIAC MOZ LDA  
COMPLEXO TEXTAFRICA  
BARRIO DA SDALPO CHIMOIO MOZAMBIQUE
3. If the shipment has already occurred (i.e., the document was lost or damaged in transit), provide copies of:
  - a. Cancelled CITES export or re-export document validated by OLE;
  - b. For wildlife, cleared Declaration for Importation or Exportation of Fish or Wildlife (Form 3-177); **AND**
  - c. Any correspondence you had with the shipper or importing country's Management Authority concerning the shipment.

\*Please be aware that if the permit was lost in transit, the issued permit will be forwarded to the Management Authority of the foreign country.
4. If the shipment has **not** occurred and the original permit no longer exists, submit a signed, dated, and notarized statement that:
  - a. Refers to the permit number and describes the circumstances that resulted in the loss or destruction of the original permit;
  - b. Includes a statement that affirms the shipment did not occur;
  - c. You are requesting a replacement U.S. CITES permit;
  - d. If found, the original permit will be returned to the Division of Management Authority.
5. If the shipment has **not** occurred and the original permit exists but has been damaged, submit the original damaged permit and a signed, dated, and notarized statement that:
  - a. Describes the circumstances that resulted in the permit being damaged;
  - b. Includes a statement that affirms the shipment did not occur;
  - c. You are requesting a replacement U.S. CITES permit.
6. Address where you wish permit mailed (if different from page 1):

Frank (b) Spencer  
(b) (6)  
El Paso, TX (b) (6)

U.S. Fish & Wildlife Service – Headquarters  
Attn Division of Management Authority – Branch of Permits  
MS: IA  
5275 Leesburg Pike  
Falls Church, VA 22041-3803

RE: Permit 17US55670C/9

I am requesting an amendment and replacement for permit 17US55670C/9 as the shipment has not occurred. Permit has been lost and if original permit is found, I will return it to the Division of Management Authority.

Sincerely,



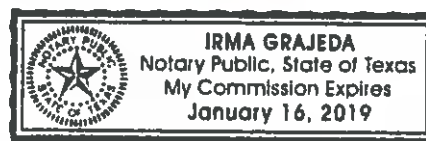
Frank (b) Spencer  
(b) (6)  
)

State of Texas County (b) (6)

This instrument was acknowledged before me on May 31, 2018 by  
Frank (b) Spencer



Notary Public Signature







**FROM:**

Frank (b) Spencer

(b) (6)

El Paso, TX (b) (6)

RCVD JUN 08 2018

**TO**

U.S. FISH & WILDLIFE SERVICE – HEADQUARTERS

ATTN: Division of Management Authority – Branch of Permits

MS: IA

275 Leesburg Pike

Falls Church, VA 22041-3803

Attached are applications to amend and replace Permit US1755670C/9.

Please feel free to contact me if you have any question regarding this request. I can be reached at

(b) (6)

Thank you!

If you are requesting an amendment to an issued permit that is still valid, then please submit application form 3-200-52.

If you are requesting a replacement for an issued permit that is still valid, then please submit application form 3-200-66.

If you are requesting an amendment to an issued permit that is still valid and has also been lost, then please submit application form 3-200-52, and page two of application form 3-200-66.

On your cover letter please explain what you are requesting so that both the data entry staff and the LIE are clear for what you are applying.

If the permit has expired, has been lost, and you need to amend the permit, then please submit application form 3-200-52, and in your cover letter explain that the permit has both expired and been lost.

Respectfully,

George D. Villavicencio

---

George D. Villavicencio, J. D.  
Supervisory Policy Specialist  
U.S. Fish & Wildlife Service - Headquarters  
Attn Division of Management Authority - Branch Of Permits  
MS: IA  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
703-358-2483 (Telephone)  
703-358-2280 (Facsimile)  
Jorge\_Villavicencio@fws.gov

WARNING: The contents of this e-mail (including attachments) might be protected under the Privacy Act and intended only for the use of the individual(s) and/or entity(ies) named above. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If the recipient or reader of this e-mail is not the intended recipient, you are hereby notified that any dissemination, disclosure, copying or distribution of the contents of this e-mail message is strictly prohibited. If you have received this e-mail in error, please immediately notify the sender and destroy all copies without reading or disclosing their contents. Thank you.

On Tue, May 8, 2018 at 3:32 PM, Meehan, John <[John.Meehan@mig.com](mailto:John.Meehan@mig.com)> wrote:

Hi can you please confirm form number that should be submitted for a lost permit as well that it must be amended to change the address in box 4 for the foreign name & address.

I am not sure if we use 66 or 52 or both.

Thanks in advance

JJ

LB



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

OMB No 1018-0093  
Expires 05/31/2017

RCVD JUN 08 2018

# 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 SPENCER	1 b First name FRANK	(b) (6) Middle name or initial (6)	1 d Suffix
2 Date of birth (mm/dd/yyyy) (b) (6)	3 Social Security No. (b) (6)	4 Occupation (b) (6)	5 Affiliation/ Doing business as (see instructions)
6 a Telephone number (b) (6)	6 b Alternate telephone number (b) (6)	6 c Fax number (b) (6)	6 d E-mail address (b) (6)

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

C. All applicants complete address information			
1 a Physical address (Street address; Apartment #, Suite #, or Room #, no P.O. Boxes) (b) (6)			
1 b City EL PASO	1 c State TEXAS	1 d Zip code/Postal code (b) (6)	1 e 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 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 <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 17US55670C/9 No <input type="checkbox"/>
3	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) 05/31/18

**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 17US55670C/9.
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: \_\_\_\_\_

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: 05-21-18

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.



RE: Form 3-200-52

Pg: 3 of 10

Section b

**Request to change the country of shipper to the address below:**

EMIAC MOZ LDA

COMPLEXO TEXTAFRICA

BARRIO DA SDALPO CHIMOIO MOZAMBIQUE

Permittee's Signature:



Date:

05/31/16

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

FRANK (b) SPENCER

(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.

**E. REPLACEMENT DOCUMENT (CITES/ESA/MMPA/WBCA/LACEY ACT)**

**NOTE 1:** Use this application to request a replacement document if your currently valid permit has been lost or misplaced (for this application, all permits, registrations, and certificates are referred to as a permit).

**NOTE 2:** The application **must** be submitted to the office that issued the initial permit.

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 submit, indicate the application question number you are addressing.

1. Identify the permit number (found in the upper right corner) of the permit needing replacement, if known:  
US1755670C/9
2. Current location of specimen (include address and country):  
EMIAC MOZ LDA  
COMPLEXO TEXTAFRICA  
BARRIO DA SDALPO CHIMOIO MOZAMBIQUE
3. If the shipment has already occurred (i.e., the document was lost or damaged in transit), provide copies of:
  - a. Cancelled CITES export or re-export document validated by OLE;
  - b. For wildlife, cleared Declaration for Importation or Exportation of Fish or Wildlife (Form 3-177); **AND**
  - c. Any correspondence you had with the shipper or importing country's Management Authority concerning the shipment.

\*Please be aware that if the permit was lost in transit, the issued permit will be forwarded to the Management Authority of the foreign country.
4. If the shipment has **not** occurred and the original permit no longer exists, submit a signed, dated, and notarized statement that:
  - a. Refers to the permit number and describes the circumstances that resulted in the loss or destruction of the original permit;
  - b. Includes a statement that affirms the shipment did not occur;
  - c. You are requesting a replacement U.S. CITES permit;
  - d. If found, the original permit will be returned to the Division of Management Authority.
5. If the shipment has **not** occurred and the original permit exists but has been damaged, submit the original damaged permit and a signed, dated, and notarized statement that:
  - a. Describes the circumstances that resulted in the permit being damaged;
  - b. Includes a statement that affirms the shipment did not occur;
  - c. You are requesting a replacement U.S. CITES permit.
6. Address where you wish permit mailed (if different from page 1):

Frank (b) Spencer  
(b) (6)  
El Paso, TX (b) (6)

U.S. Fish & Wildlife Service – Headquarters  
Attn Division of Management Authority – Branch of Permits  
MS: IA  
5275 Leesburg Pike  
Falls Church, VA 22041-3803

RE: Permit 17US55670C/9

I am requesting an amendment and replacement for permit 17US55670C/9 as the shipment has not occurred. Permit has been lost and if original permit is found, I will return it to the Division of Management Authority.

Sincerely,



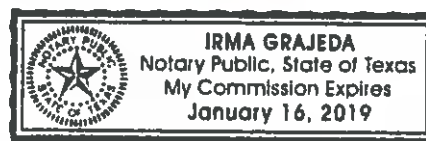
Frank (b) Spencer  
(6)

State of Texas County (b) (6)

This instrument was acknowledged before me on May 31, 2018 by  
Frank (b) Spencer



Notary Public Signature









Department of Interior  
U.S. Fish and Wildlife Service

RCVD JUN 08 2018

LB

## Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service  
Division of Management Authority  
Branch of Permits, MS: 1A  
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 <b>Kirsch</b>	1 b. First Name <b>Patrick</b>	1 c. Middle Name <b>(b) (6)</b>	1 d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number	3 a. Alternate Telephone Number	4. E-mail address

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

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

## Section C: All applicants complete address information

1. a. Physical address (Street address; Apartment #, Suite # or Room # no P.O. Boxes) <b>(b) (6)</b>				
1. b. City <b>Waconia</b>	1. c. State <b>MN</b>	1. d. Zip code/Postal code <b>(b) (6)</b>	1. e. County/Province	1. f. Country <b>USA</b>
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 <i>Title 50 Part 13 of the Code of Federal Regulations</i> and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) <b>Patrick Kirsch</b> <b>(b) (6)</b> <b>05/21/2018</b>

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)



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 Managen  
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 every year for the past 8 years and reports seeing a number of male lions above the age of 6 years. He credits this to the thoughtful and successful game management 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 Frontiers 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

- 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 area 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

Patrick Kirsch  
Form 3-200-20  
5-21-2018

## Questions - Answers 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 <sup>game</sup> 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 (b)(6) Kirsch 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).



# 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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June 12, 2018

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

RCVD JUN 14 2018

Re: Five Applications for Permits to Import Sport-Hunted Trophies

Dear Chief Cogliano:

Enclosed please find one application for a permit to import a sport-hunted elephant trophy from the Save Valley Conservancy (SVC) in Zimbabwe. This elephant was hunted in April 2018. Conservation Force and Zimbabwe's Parks and Wildlife Management Authority (ZPWMA) have submitted extensive information about the healthy elephant population in SVC and the benefits generated by regulated hunting for the protection of elephant, lion, rhino, and a range of other species. Please refer to that information, including the October 2016 Non-Detriment Finding, January 2016 report related to the African lion, June 20, 2015 response to the Fish and Wildlife Service's information request, and other submissions on the African elephant.

Please also see the attached excerpt from the African Elephant Status Report and declaration from Wilfried Pabst. These documents reflect the healthy elephant population at SVC. We respectfully request that you consider all information submitted in making a positive enhancement finding for this applicant.

Enclosed please also find an application for a permit to import a lion trophy to be hunted with Charlton McCallum Safaris (CMS) in Dande, Zimbabwe. We have previously provided extensive information about CMS and their anti-poaching unit, the Dande Anti-Poaching Unit (DAPU). Attached please find two recent DAPU reports. Please consider all information regarding CMS and DAPU, as well as the extensive information and responses to DMA information requests submitted by Zimbabwe's Parks and Wildlife Management Authority, in making a positive enhancement finding for this applicant.

Enclosed please also find an application for a permit to import a sport-hunted lion trophy to be hunted in the Nyaminga Game Management Area in Zambia. An enhancement report for this area/operator is attached. The operator spends \$10,000 per year to sustain a 28-person anti-poaching team, which heavily patrols the concession and protects the habitat for healthy populations of lion, leopard, hippo, and many other species. In addition, the operator has installed four boreholes and constructed a medical clinic, teacher's house, and dormitory for the local community. Please consider this information and information provided by Conservation Force and Zambia's Department of National Parks and Wildlife, in making a positive enhancement finding for this applicant.

Finally, enclosed please find two applications (father and son) for permits to import elephant trophies to be hunted in the Bwabwata West concession in Namibia. This concession, like the rest of Namibia, boasts a dense population of elephant. Please see the attached operator report and excerpt from the African Elephant Status Report (2016). The operator employs a 20-person anti-poaching team and invests heavily in the nearby communities (almost \$300,000 in the last three years). Please consider this information and information in the DMA's files and previously provided by Conservation Force and

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](mailto:jjj@conservationforce.org)  
[www.conservationforce.org](http://www.conservationforce.org)

Namibia's Ministry of Environment and Tourism in making a positive enhancement finding for this applicant.

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

Sincerely,

Regina Lennox

### NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III 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\_\_\_\_ 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: \_Ross [redacted] Studer\_\_\_\_\_

Date: \_May 8, 2018\_\_\_\_\_

*May 9th, 2018*





RCVD JUN 14 2018

LB

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

Type of Activity

U.S. Fish and Wildlife Service  
Division of Management Authority  
Branch of Permits, MS 1A  
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 Stinger	1.b. First Name Ross	1.c. Initial (b) (6)	1.d. Suffix
2.a. Date of Birth (mm/dd/yyyy) 05/24/1964	2.b. Telephone Number (b) (6)	2.c. Alternate Telephone Number (b) (6)	2.d. E-mail address

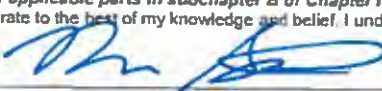
**Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution**

1. Name of business, agency, Tribe, or institution (b) (6)		1.b. Doing business as (DBA)	
2. Tax identification no. (b) (6)		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 San Antonio	1.c. State TX	1.d. Zip code (b) (6)	1.e. 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. 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)  06/08/2018

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 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:

Namibia, Bwabwata West National Park, S 18 09' C 162 E 021 42'C 495, Caprivi Area, Rundu Town

b. Date wildlife is to be hunted:

July 1st to July 21st, 2018

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

Hunt Africa Namibia, Professional Hunter: Jacobus Hugo Pienaar (Junior)  
PO Box 1100 Gobabis Omaheke Namibia, Farm Hester 407, Gobabis, Namibia

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). 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: Mr. Louw Nel  
Business Name: Tropaendienste Taxidermy  
Address: PO Box 21068, Windhoek, Namibia  
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?

Population growth of herds up to 500 at a time. Last game count was in Oct 2017 and estimated resident elephant in the area of more than 2000

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?

40% of the trophy fees go to the Namibia government to the Game Products Trust Fund. The funds are used for repairs, maintenance and salaries for government game rangers in areas where there are Elephant roaming. Another 40% go to the community that is used to pay game guards and for the uplifting of the KWE people.

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 outfitter pays informers in the area to help with anti poaching activities.

The outfitter / Professional Hunter is a trustee on HUAP (Hunters United Against Poaching) Trust

**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: 6/11/18

*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).





### 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 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](mailto:cf@conservationforce.org)

Signed: Paul (b) (6) Monsen

Name: PAUL (b) (6) MONSEN

Date: 05/11/18



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)

RCVD JUN 14 2018

LB

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

A. Complete if applying as an individual			
1.a. Last name <b>MONSEN</b>	1.b. First name <b>PAUL</b>	1.c. Middle name or initial <b>(b) (6)</b>	1.d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	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>(b) (6)</b>				
1.b. City <b>SALT LAKE CITY</b>	1.c. State <b>UT</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	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

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 – <b>attach documentation of fee exempt status as outlined in instructions.</b> (50 CFR 13.11(d))	
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in <b>Title 50, Part 13 of the Code of Federal Regulations</b> and the other <b>applicable parts in subchapter B of Chapter I of Title 50</b> , 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>(b) (6)</b> <b>(b) (6)</b>	
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) <b>(b) (6)</b>	Date of signature (mm/dd/yyyy) <b>05/11/2018</b>

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)? PAUL MON

Conservation Force, 504-837-1233, cf@conservationforce.org

(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. ELEPHANT  
LOXODONTA AFRICANA, COMMON NAME: ELEPHANT
- 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:  
SANJO, SANE VALLEY CONSERVANCY  
PROVINCE: MASINGO. NEAREST TOWN MASUNGO
- b. Date wildlife was hunted: APRIL 16, 2018 thru april 26, 2018
- b. Name of hunting outfitter, safari company, or professional hunter you hunted with:  
IVORY TRAILS SAFARI / ZAMBEZI HUNTERS  
PHILLIP SMYTHE
- 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 JOSIAH CHYAMANO 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: *TROPHY CONSULTANTS INTERNATIONAL*  
Business Name: *43091AH CHINAMANO ROAD, BELMONT*  
Address: *BULAWAYO*  
City: *ZIMBABWE*  
State/Province: *ZIMBABWE*  
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 information previously  
submitted by ZPLWA +  
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?

- 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)

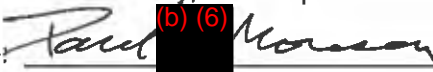
10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

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:  (b) (6) \_\_\_\_\_ Date: 05/11/18

*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).



Conservation Force  
Operator Enhancement Questionnaire

v.5/8/18

- 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)? VOLUNTARY MAINTENANCE OF BOREHOLES  
SCHOOL SUPPORT
- 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: USD 10,000
- 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
- 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				NIL
Leopard				PAID
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)			2000	MAINTENANCE, DESKS, CHAIRS
Education (e.g., school fees, supplies)			1000	EXERCISE BOOKS PEN PENCILS
Health (e.g., clinics, offices)			1000	ROOFING, REPAIRS
Health (e.g., medical salaries, equipment)			NIL	
Community scout salaries			NIL	
Other community anti-poaching			NIL	
Local government activities			NIL	
Water infrastructure improvements			5000	BOREHOLE MAINTENANCE

Conservation Force  
Operator Enhancement Questionnaire

v.5/8/18

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

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts			117600	
Equipment			11 000	
Vehicles			10 920	
<del>Petrol</del> <b>DIESEL</b>			<del>3 000</del> 10 920	
Rewards paid			3000	
Other: _____				
Other: _____				
TOTALS			142520	

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered			16	
Ivory poachers arrested			NIL	
Meat poachers arrested			16	
Other poachers arrested			NIL	
Poachers convicted			16	
Snares/gin traps collected			NIL	
Firearms confiscated			NIL	
Vehicles confiscated			NIL	
Bicycles confiscated			NIL	
Boats/nets confiscated			NIL	
Tusks recovered			NIL	
Carcasses observed			NIL	
Other: _____				

10. Community investment:<sup>3</sup>

<sup>3</sup> 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."

Conservation Force  
Operator Enhancement Questionnaire

v.5/8/18

Professional Hunters	CONTRACTED	
Trackers	CONTRACTED	
Anti-poaching scouts/rangers	44	
Other anti-poaching	0	
Cooks/housekeepers	17	
Community coordinators	NIL	
Managers	8	
Biologists	1	
Others: _____	60	

7. Number of staff employed in the off-season: 130

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			
Community relations personnel			
Others: _____			

AS ABOVE

8. Anti-poaching efforts:<sup>2</sup>

- a. Number of anti-poaching staff: 44
- 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 YEAR
- d. Number of anti-poaching patrols per month: ± 460 / MONTH
- e. Description of anti-poaching equipment, vehicles, etc.: VEHICLES, RADIOS x 16, SHOTGUNS x 30
- f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? ANTI POACHING MANAGER
- g. Do you offer rewards to poaching informants leading to arrest? ☒ Yes ☐ No

<sup>2</sup> 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

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: SANKO Size in km<sup>2</sup>: 600
  - 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. 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 OPERATING PROCEDURE
  - d. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city:  
CHIRIKOZHI MASVINGO
  - e. If the concession borders a national park, please provide the park name: N/A
  - f. Description of general and distinctive habitat features and any water features:  
SAVE RIVER; MOKOCE RIVER; 9 BIOMES IN AREA
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? \_\_\_\_\_
5. Relevant game populations in the concession:<sup>1</sup>

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/down/ stable)	How monitored?
Elephant	<u>DENSE</u>	<u>684</u>	<u>UP</u>	<u>AERIAL COUNT</u>
Lion	<u>DENSE</u>	<u>120</u>	<u>UP</u>	<u>"</u>
Leopard	<u>DENSE</u>	<u>147</u>	<u>UP</u>	<u>"</u>
Prey species	<u>DENSE</u>		<u>STABLE</u>	<u>"</u>

6. Total employment number: 130
  - 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
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<sup>1</sup> 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?"

Conservation Force  
Operator Enhancement Questionnaire

v.5/8/18

Sports teams funded		NIL		
Construction materials donated		NIL		
Other: _____				
Other: _____				
TOTALS		7000		

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)	23 75%	20 60%	20 60%
-- hunting lion	2 100%	2 100%	1 100%
-- hunting elephant	2 100%	1 50%	1 50%
-- hunting leopard	5 100%	4 80%	3 80%

12. Dollar amount and percentage of the company's revenue from U.S. clients: \$50,000 - 62%

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: W.G. TAYLOR

Title: REPRESENTING ZAMBEZI HUNTERS

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

FRIENDS OF ANIMALS, *et al.*,

Plaintiffs,

v.

Ryan ZINKE, *et al.*,

Defendants, and

SAFARI CLUB INTERNATIONAL *et al.*,

Intervenor-Defendants.

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No. 17-cv-002530-RCL

Judge Royce Lamberth

**DECLARATION OF SAVÉ VALLEY CONSERVANCY  
IN SUPPORT OF MOTION TO INTERVENE**

I, Wilfried Pabst make the following declaration in support of the attached Motion to Intervene.

1. I make this declaration based upon my personal, first-hand knowledge.
2. I make this declaration on behalf of Savé Valley Conservancy ("SVC"). I own the Sango Ranch, one of the properties that together form the conservancy. I am involved in all aspects of operating SVC and decision-making related to the management of habitat and wildlife, poaching control, community investment, research, and similar issues.
3. SVC is one of the largest private game reserves in Africa. It is in the South East Lowveld of Zimbabwe and provides approximately 3,500 km<sup>2</sup> of diverse wildlife habitat for healthy populations of elephant, lion, leopard, buffalo, rhino, and rare African Wild Dogs.
4. SVC consists of privately-, government-, and community-owned properties aligned under a constitution to manage animal populations on a landscape scale. Each property operates its own tourist lodges offering different types of accommodations in varied ecological settings. While



each property is separately owned, internal fences have been removed to create the conservancy's contiguous protected area, and wildlife management decisions are taken at the conservancy level.

5. SVC was a cattle ranch for seven decades before it converted to wildlife habitat and came together as one conservancy in the 1990's. Approximately 4,000 animals of 14 species were reintroduced, including elephants in the largest translocation undertaken to date (~685 elephants). Given the extent of habitat and the owners' commitment to conservation, wildlife populations grew rapidly. SVC developed into a conservation area of global significance. A portion of SVC was re-settled in 2000-2001. Villages remain in a few areas otherwise committed to wildlife. Although human-wildlife conflicts can arise in this situation, conflicts are mitigated by benefits-sharing and intensive anti-poaching.

6. Regulated hunting was essential for the successful transition from cattle to wildlife, because it generated income to restock game and improve security. One property sought to attract non-consumptive photographic safaris through an up-market lodge offering game drives and bush walks. Occupancy rose from 0% in 1996 to 62% by the end of 1999; however, following the land reform program and resultant political instability, the photo-tourism industry collapsed. The lodge experienced a 98%-cancellation of confirmed bookings. Regulated hunting was, and remains, the only economically viable land use. After four years of seeking alternative markets, the lodge could achieve no higher than 17% occupancy, and moved back into a hunting-based operation. Now, all of SVC's revenues come from regulated hunting.

7. SVC conducts annual aerial surveys and road strip counts to determine population trends, distribution, and social organization of large herbivores, keeps track of annual rainfall, and monitors vegetation and soil conditions to guide management decisions and quota setting. A yearly

predator spoor count is conducted as well. A Technical Advisory Committee recommends evolving best wildlife management practices.

8. SVC's anti-poaching efforts are extensive. Approximately 200 game scouts patrol the various ranches to pick up snares and keep meat poaching under control. A special team of 30 to 40 highly-trained scouts, the Special Species Protection Unit (SSPU), combats elephant and rhino poaching specifically. Annual anti-poaching expenses (ranger salaries, training, vehicles, equipment, petrol, and other necessities) are almost \$500,000. We hope to expand the SSPU to 50 individuals at the cost of another \$100,000 per year.

9. In the past 25 years, SVC's elephant population has quadrupled from the original, translocated individuals. The population is estimated at 2,200. Elephant management is guided by an adaptively-implemented plan incorporating regulated hunting to achieve management targets. The annual hunting quota is seven elephants, representing only 0.3% of the population. Those few hunts generate significant revenue that is reinvested in management and protection, including for the large black rhino population, which is not currently hunted.

10. After SVC was established and as ungulate populations increased, lion began to recolonize the conservancy and thirteen lions were reintroduced, including ten on Sango ranch. After an initial lag period, the population has flourished. Annual monitoring began in 1999. Since 2007, annual monitoring is conducted using track index surveys in a research project co-sponsored with the African Wildlife Conservation Fund. In 2011, those survey results were verified using a baited call-up. Prey availability models suggest SVC's carrying capacity for lion is approximately 271. The 2015 population was estimated at 284. This suggests lion have reached the ecological carrying capacity, even though responsibly hunted.

11. Lion are managed under an adaptive, science-based plan adopted in 2011. The plan specifically incorporates regulated hunting as a management conservation tool. Quotas are set at a low percentage of the total population; from 2009 to 2015, the annual quota was seven lion and, as a result of full compliance with the age-based system implemented in 2013, the quota was raised to ten lion for 2016.

12. Both Conservation Force and Dallas Safari Club have funded conservation activities within SVC. For example, Conservation Force co-funded our lion management plan.

13. On behalf of SVC, I provided information to Conservation Force to evidence the benefits of elephant and lion hunting on the Conservancy, which I understood would be used for comments in response to the U.S. Fish and Wildlife Service suspension of elephant trophy imports from Zimbabwe and in support of applications for elephant and lion trophy import permits.

14. Revenues from regulated elephant and lion hunting is essential to supporting ranch owners' investment in habitat management, poaching control, water provision, fence maintenance, and community support, which benefit the elephant and lion. These revenues are extensive. For the period 2005 to 2011, Dr. Rosemary Groom on behalf of SVC estimated that net income from lion hunting (< 4 lion per year) amounted to over \$1.36 million in bed nights and \$260,000 in trophy fees. Dr. Groom also calculated the "significant cost" lion "impose on conservancy landowners through predation on valuable prey species that could otherwise be sold as trophies or meat." The calculated loss of 8% relative to gross income in 2009 was \$494,776. If this loss is not offset with regulated hunting income, it is difficult for landowners to bear the expense of the large and growing lion population.

15. SVC invests over \$100,000 in community infrastructure and game meat donations to reduce conflicts and increase tolerance among local villages: drilling boreholes, building clinics

and schools, providing computer equipment, etc. SVC entered into an agreement with local Chiefs to share revenues from regulated hunting and sales of game meat.

16. Over 90% of SVC's hunting clients are U.S. citizens—and this percentage is 100% on some properties. SVC relies on these U.S. clients to fund its extensive anti-poaching efforts and science-based elephant and lion management. At least three U.S. hunters have applied for permits to import lion or elephant trophies hunted in SVC in 2015, 2016, and 2017.

17. SVC's revenues will decline if elephant and lion trophies are not importable into the U.S. Consequently, its excellent management efforts will suffer. The quotas will not change (and did not change when the U.S. Fish and Wildlife Service suspended the import of elephant trophies from Zimbabwe or listed the lion as threatened under the U.S. Endangered Species Act). However, the willingness of U.S. citizens to pay premium prices was reduced by these policy decisions, and in turn, SVC's revenues were reduced. These revenues will be cut further if imports remain closed. Unfortunately, the conservancy's elephant, lion, rhino, and other wildlife populations will pay the price if anti-poaching efforts and community investment and conflict mitigation expenditures must be reduced as well.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

February 19, 2018

A handwritten signature in black ink, appearing to read 'Wilfried Pabst', is written over a horizontal line.

Wilfried Pabst

## COUNTRY

## Zimbabwe



## ESTIMATED TOTAL ELEPHANTS

**82,630 ± 8,589**

## GUESSES

**1,635 - 1,805**

## GENERAL STATISTICS

Country Area	390,580 km <sup>2</sup>
Range Area	81,228 km <sup>2</sup> (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  $\pm$  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<sup>2</sup>, 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 Matabeleland.

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  $11,656 \pm 2,259$  (Dunham et al. 2015c). The previous comparable estimate was  $19,297 \pm 2,527$  in 2001 (Mackie, 2002). The 2014 figure replaces an estimate from the AESR 2007 of  $19,981 \pm 2,392$  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  $3,407 \pm 1,215$  (Dunham et al., 2015b) which replaces an estimate of  $15,024 \pm 2,133$  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  $53,991 \pm 7,711$  (Dunham et al., 2015a), which replaces an estimate of  $49,310 \pm 7,051$  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



# NUMBERS AND DISTRIBUTION

## CONT.

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 Ngwasha/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  $11,120 \pm 2,709$  (Dunham & van der Westhuizen, 2015). This replaces an estimate of  $4,987 \pm 1,577$  from a comparable 2001 survey. Another survey in 2009 gave an estimate of  $9,123 \pm 1,898$  (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  $332 \pm 519$  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  $1,585 \pm 1,295$  for the Savé Valley Conservancy. This replaces an estimate of  $527 \pm 310$  (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  $35 \pm 99$  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).

## NUMBERS AND DISTRIBUTION

### CONT.

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 Buby 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 (km <sup>2</sup> )
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
<b>Totals 2015</b>	<b>82,630</b>	<b>8,589</b>	<b>1,635</b>	<b>1,805</b>		
<b>Totals 2008</b>	<b>93,122</b>	<b>7,068</b>	<b>534</b>	<b>625</b>		
Assessed Range					97 %	78,839
Unassessed Range					3 %	2,389
<b>Total Range</b>					<b>100 %</b>	<b>81,228</b>

## 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 (km <sup>2</sup> )
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
<b>Totals</b>	<b>-10,492</b>	<b>±11,124</b>	<b>+1,101</b>	<b>+1,180</b>	<b>97 %</b>	<b>78,839</b>

## AREA OF RANGE COVERED BY EACH DATA CATEGORY

DATA CATEGORY	KNOWN RANGE (km <sup>2</sup> )	POSSIBLE RANGE (km <sup>2</sup> )	TOTAL RANGE (km <sup>2</sup> )
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
<b>Totals</b>	<b>80,213</b>	<b>1,016</b>	<b>81,228</b>

## ELEPHANT ESTIMATES

INPUT ZONE	REASON FOR CHANGE	SURVEY DETAILS			# OF ELEPHANTS		SOURCE	PFS	AREA (km <sup>2</sup> )	MAP LOCATION	
		TYPE	RELIAB	YEAR	ESTIMATE	± 95% CL				LONG	LAT.
Chegutu Safari Area	NG	O	E	2014	150		Dunham, 2015	2	445	29.6°E	17.9°S
<b>Greater Mapungubwe</b>											
Tuli, Maramani, Sentinel, Nottingham	RS	AT	A	2014	212		Seher & Page, 2015	2	1,192	29.4°E	22.0°S
<b>Lower Zambezi Valley</b>											
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
<b>Northwest Matabeleland</b>											
Fuller Forest Land	NP	O	D	2014	308		Dunham, 2015	3		25.9°E	18.1°S
Gwaai, Bembesi, and Umuza 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
<b>Sebungwe</b>											
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 (km <sup>2</sup> )	MAP LOCATION	
		TYPE	RELIAB	YEAR	ESTIMATE	± 95% CL				LONG.	LAT.
Matusadona National Park	RS	AS	B	2014	669	251	Dunham et al., 2015b	2	1,368	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
<b>Southeast Lowveld</b>											
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

## 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.

## 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)

# Zimbabwe



0 50 100 150 200 250 300 km

**ABBREVIATIONS AND ACRONYMS**  
See Appendix III for map abbreviations and acronyms



© 2016 African Elephant Specialist Group



- |                    |                       |
|--------------------|-----------------------|
| — Int'l Boundaries | <b>ELEPHANT RANGE</b> |
| — Rivers & Lakes   | Known                 |
| ● Towns            | Possible              |
| □ Protected Areas  | Doubtful              |
| — Input Zones      | ✕ Sighting            |







RCVD JUN 15 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 OF SOUTHERN  
AFRICAN LEOPARD AND NAMIBIAN SOUTHERN WHITE  
RHINOCEROS**

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 <b>KNOBELOCK</b>	1.b. First Name <b>TORREY</b>	1.c. Middle Name/Initial —	1.d. Suffix —
------------------------------------	----------------------------------	-------------------------------	------------------

2. Date of Birth (mm/dd/yyyy)	3. Sex (M/F)	4. Social Security Number
[REDACTED]		

5. Name of business, agency, tribe, or institution		6. Using business address	
7. Tax identification no.		8. Description of business, agency, tribe, or institution	
9.a. Principal officer Last name	9.b. Principal officer First Name	9.c. Principal officer Middle name/initial	9.d. Suffix
10. Principal officer title		11. Primary contact name	
12. Business telephone number	13. Business fax number	14. Business e-mail address	15. Business website

**Section C: All applicants complete address information**

1.a. Physical address (include if different than mailing address; include name of contact person if applicable)		1.d. Boxes	
[REDACTED]		[REDACTED]	
1.b. City <b>RICHMOND</b>	1.c. State <b>TX</b>	1.e. Country <b>USA</b>	
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)			
[REDACTED]			
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. Country/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)
<b>x Torrey Knoblock</b> <b>6-11-18</b>
Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** *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 4:** Certain hunting trophies, including leopard 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.

- Complete all questions on the application.
- Mark questions that are not applicable with "N/A".
- If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.
- 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 CARBO USA ATTN CINDI RULON  
15619 MORALES ROAD HOUSTON, TX 77032

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

CINDI RULON - PRO CARBO 281-226-3176

CINDI.RULON@PROCARBOUSA.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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

- a. Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20.
- b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia  
Quantity: \_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).

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 ANIMAL HAS ALREADY BEEN TAKEN, please enter the following:**

- d. 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:

FARM OKATJERU #53 WINDHOEK, NAMIBIA

- e. Date wildlife was hunted:

6/18/2016

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

OMUJEVE HUNTING SAFARI

ROYSTON WRIGHT

FARM ON6OMBO WEST SECTION 2 No 56 WINDHOEK 9000  
NAMIBIA

- g. 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]:

FARM OKATJERU 53

PO BOX 9658

WINDHOEK, NAMIBIA

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.

- a. 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: ROYSTON WRIGHT

Business Name:

Address: FARM OKATJERU #53

Address: PO BOX 9658

City: WINDHOEK

State/Province: NAMIBIA

Country, Postal Code:

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. 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: \_\_\_\_\_

10. 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.

X Applicant's signature: Tourey Khelebek Date: 6/11/2018

*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.*

11. 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).



Directorate Scientific Services  
Private Bag 13306  
Windhoek, Namibia  
Enquiries: Chief Warden,  
Permit Office



Tel +264-61-284 2111  
Fax +264-61-258 861

1635-10

**VALID FROM:**

10.06.16

**VALID TO:**

24-06-16

Permission is hereby granted in terms of the Nature Conservation Ordinance 1975 (Ord. 4 of 1975)

Name of Trophy Hunter:

T. Knibbe Lock

Residential Address:

U.S.A

Country:

to hunt the specified number of game for the sake of trophies:

**SN**

Indicates species listed on CITES  
Appendix I or II

SPECIES: COMMON NAME		Number
	Buffalo	
Sps	Crocodile	
	Dik-dik	
	Eland	
Sps	Elephant	
	Giraffe	
	Grey Dukler	
Sps	Hippopotamus	
	Impala, Black-faced	
	Impala, common	
	Klipspringer	
	Kudu	
Sps	Lectwe	
	Oryx (Gemsbok)	
	Ostrich	
	Red hartebeest	
	Reedbuck	
Sps	Rhinoceros, black	
Sps	Rhinoceros, white	
	Roan	
	Sable	
	Springbok	

[illegible]

on the following farms / hunting concessions:

Oktober #53

Guided by (name of guides):

R. Wright

Cashier receipt No.:

MEI 64-618

**Issued on**

10.06.16

Amount received: N\$

105-97

Riches

Authorizing officer

NIAPP 115/250  
(2016)

-Official MET date stamp

**IMPORTANT:** This permit is not valid if altered in any way.



# 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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June 13, 2018

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

RCVD JUN 19 2018

Re: Application for a Permits to Import a Sport-Hunted Elephant Trophy

Dear Chief Cogliano:

Enclosed please find one application for a permit to import a sport-hunted elephant trophy from the N#a Jaqna Conservancy in Namibia. An enhancement report from this operator will follow. We are also enclosing information from the African Elephant Status Report (2016) about Namibia's growing elephant population, a study on the benefits of elephant hunting to community conservancies in Namibia and a study on the views of Namibian conservancy members towards hunting, and information from the Namibian Association of CBNRM Support Organizations (NACSO) about this area. Elephant hunting in Namibia and in this area generates significant benefits for the species and the rural communities that rely on hunting revenues and meat distributions. 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.

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)
- Naidoo et al. (2016)
- Angula et al. (2018)
- NACSO: N#a-Jaqna Conservancy (main page, 2016 fact sheet)

### 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 bush Elephant 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: \_\_\_\_\_

Date: \_\_\_\_\_

(b) (6)  
Amy Dement  
(b) (6)  
Amy Dement  
05/10/2018



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: 1A  
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)**

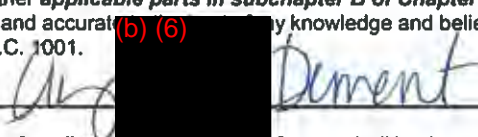
RECEIVED JUN 19 2018

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 DEMENT	1.b. First name AMY	1.c. Middle name or initial (b) (6)	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 OAKFIELD	1.c. State TN	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) (b) (6)					
2.b. City MEDINA	2.c. State TN	2.d. Zip code/Postal code: (b) (6)	2.e. County/Province	2.f. Country 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 – <b>attach documentation of fee exempt status as outlined in instructions.</b> (50 CFR 13.11(d))	
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in <b>Title 50, Part 13 of the Code of Federal Regulations</b> and the other <b>applicable parts in subchapter B of Chapter I of Title 50</b> , and I certify that the information submitted in this application for a permit is complete and accurate to my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  <div style="display: flex; justify-content: space-between;"> <div> Signature of applicant   for permit (No photocopied or stamped signatures) </div> <div> Date of signature (mm/dd/yyyy)  05/10/2018 </div> </div>	

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](mailto: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.

African bush 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; Area - N/a Jagna Conservancy; Region - Bushmanland region of Namibia  
Nearest Town - Tsumkwe; Nearest City - Windhoek

b. Date wildlife is to be hunted: 06-16-18 to 07-04-18

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

Name of Hunting Outfitter - Peter Thormahlen; Name of Safari Company - Thormahlen & Cochran  
Safaris Namibia Pty Ltd.; Name of Professional Hunter - Anton Mynhardt Alberts

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].

SHIPPING COMPANY:  
Name: Rainer Sentefoll  
Business Name: African Shipping Services CC  
Address: 46 TV Moore Street Southern Industrial  
City: Windhoek  
State/Province:  
Country, Postal Code: Namibia  
Rainer@africanshippingsservices.com  
Tel: +264 61 305821

PROFESSIONAL HUNTER:  
Anton Mynhardt Alberts  
92 Nelson Mandela Ave.  
Stillwater #5  
Klein Windhoel  
Windhoek  
Namibia

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 Namibian Government (Ministry of Environment & Tourism-MET) has this information and forwarded it to the USF&W.

- 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?

Funds Paid: Trophy Fee-\$15,000; Community Fee-\$22,500; License Fee-\$1,000;  
Daily Rates-\$4,400 per day; Operator Conservation Fee-\$5,000

The Operator Conservation Fee Funds are used to develop the concession, which will be explained in the Concession Report answer to question 9c.

Usage of Funds by Community: Funds going to the N/ra Jagna Community is being managed by and audited by the Naye Naye Development Foundation (NNDF), which is a non-profit organization that works hand in hand with the WWF in Namibia. Monies were used to buy a Toyota Hilux Pick-up plus a number of community development programs were funded.

- 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 (b) (6) is imported into the United States, cannot be re-exported.

**Applicant's signature:** Anthony Dement **Date:** 05/10/2018

*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).



# 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



# Namibia



## ESTIMATED TOTAL ELEPHANTS

**22,754 ± 4,305**

## GUESSES

**90 - 90**

## GENERAL STATISTICS

Country Area	825,418 km <sup>2</sup>
Range Area	164,069 km <sup>2</sup> (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  $\pm$  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<sup>2</sup>, 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  $\pm$  3,580, 9,165  $\pm$  2,016, 14,097  $\pm$  2,678 and 13,116  $\pm$  3,413 (Chase, 2007; Craig & Gibson, 2013b, 2014; Craig, 2011b; Gibson & Craig, 2015a). The previous estimate in the AESR 2007 was 8,725  $\pm$  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#u 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  $\pm$  1,940, 3,638  $\pm$  1,164, and 6,413  $\pm$  2,566 (Craig & Gibson, 2013a; Gibson & Craig, 2015b; MET, 2012). The 2015 figure replaces an estimate of 3,758  $\pm$  2,289 for Khaudum, 61  $\pm$  115 for N#u Jaqna (Kolberg, 2004) and 967  $\pm$  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 Ukwuagali 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).



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  $3,378 \pm 1,756$  and 2,810 (confidence limits not available) (Kolberg, 2012; MET, 2012). The most recent **aerial sample count** from 2015 gave an estimate of  $2,911 \pm 637$  (Kilian, 2015) and replaces an estimate of  $2,057 \pm 598$  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  $314 \pm 154$  (MET, 2012). This replaces an estimate of  $210 \pm 157$  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 Houanib and Houarusib 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% CL	FROM	TO	PERCENT (%)	AREA (km <sup>2</sup> )
Aerial Sample Counts	22,754	4,306	—	—	42 %	68,121
Informed Guesses	0	—	90	90	10 %	16,162
<b>Totals 2015</b>	<b>22,754</b>	<b>4,305</b>	<b>90</b>	<b>90</b>		
<b>Totals 2008</b>	<b>15,807</b>	<b>3,276</b>	<b>20</b>	<b>20</b>		
Assessed Range					52 %	84,283
Unassessed Range					48 %	79,786
<b>Total Range</b>					<b>100 %</b>	<b>164,069</b>

#### 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 (km <sup>2</sup> )
Repeat Survey	+6,947	±5,410	0	0	50 %	81,727
New Guess	0	0	+70	+70	2 %	2,556
<b>Totals</b>	<b>+6,947</b>	<b>±5,410</b>	<b>+70</b>	<b>+70</b>	<b>52 %</b>	<b>84,283</b>

#### AREA OF RANGE COVERED BY EACH DATA CATEGORY

DATA CATEGORY	KNOWN RANGE (km <sup>2</sup> )	POSSIBLE RANGE (km <sup>2</sup> )	TOTAL RANGE (km <sup>2</sup> )
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
<b>Totals</b>	<b>112,471</b>	<b>51,598</b>	<b>164,069</b>

## ELEPHANT ESTIMATES

INPUT ZONE	REASON FOR CHANGE	SURVEY DETAILS			# OF ELEPHANTS		SOURCE	PFS	AREA (km <sup>2</sup> )	MAP LOCATION	
		TYPE	RELIAB.	YEAR	ESTIMATE	± 95% CI				LON	LAT
Etosha National Park	RS	AS	B	2015	2,911	637	Kilan, 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		Linderquist 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, 2015a	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

## 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.

## 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).



## Contributed Paper

# Complementary benefits of tourism and hunting to communal conservancies in Namibia

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**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

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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 com-

mercial 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. 2011b; 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

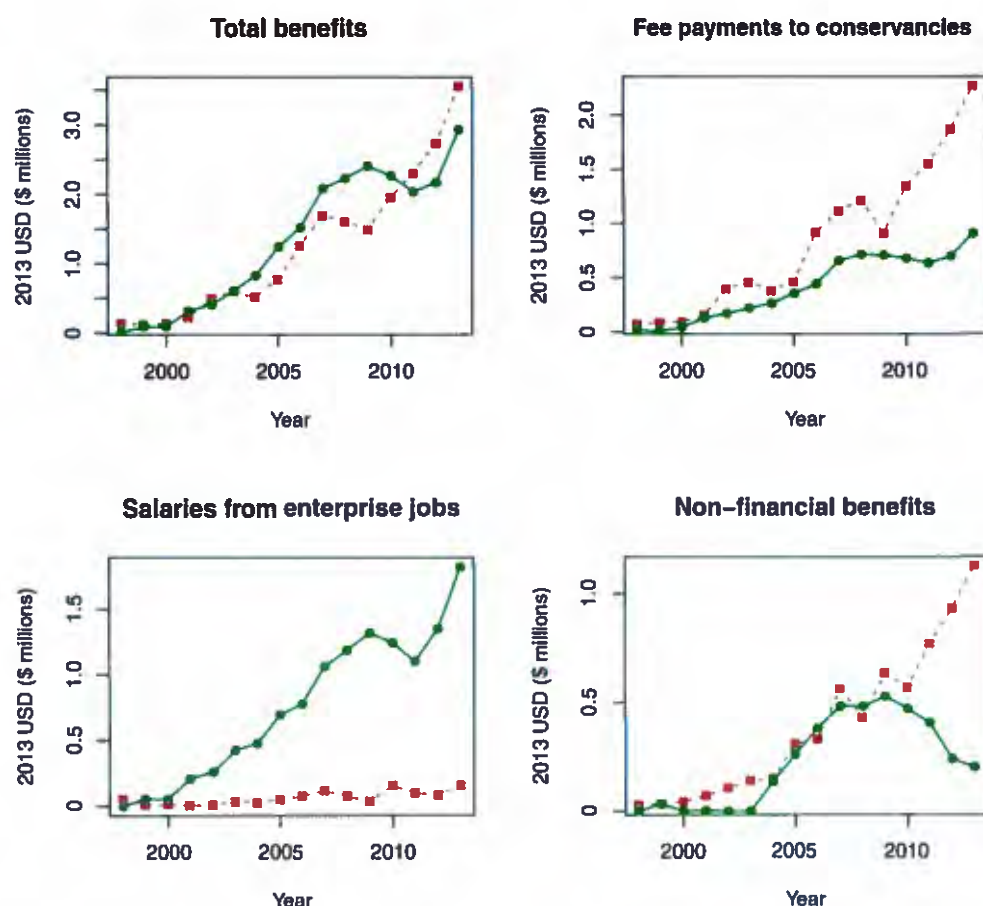
and changes in resource management policies affect such benefit flows on communal lands.

## 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 CB-NRM 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<sup>2</sup> (Fig. 4). When conservancy income from tourism was removed, the effect was again negative but

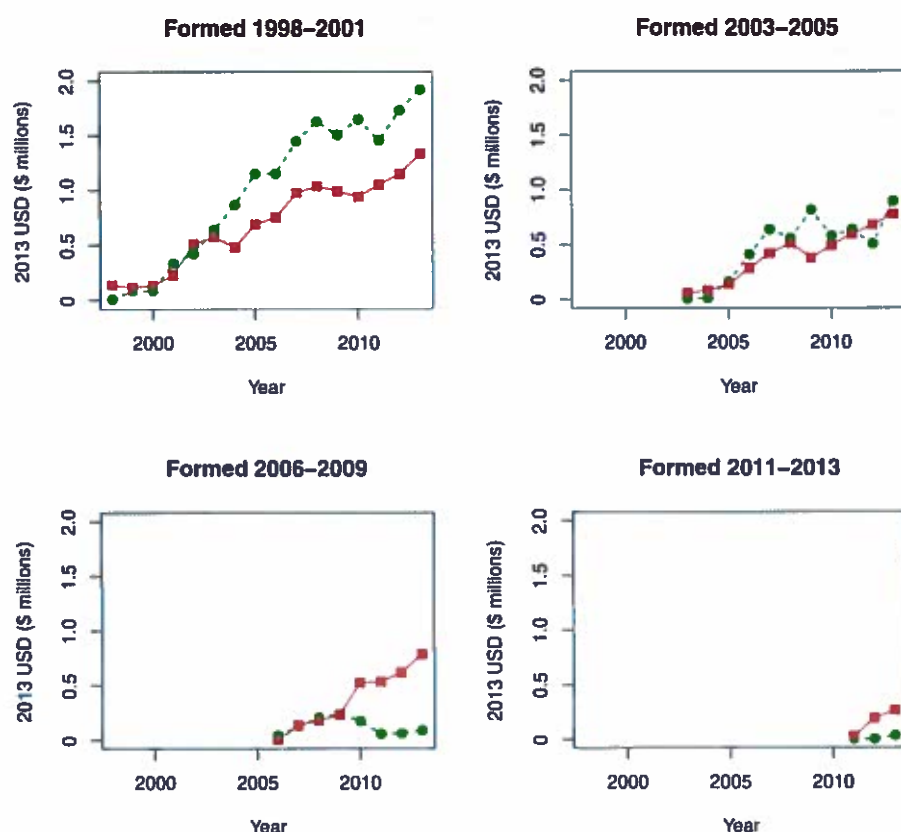


Figure 2. Total benefits from 1998-2013 for hunting (squares) and tourism (circles) across conservancies formed in 4 periods: (a) 1998-2001 ( $n = 15$ ), (b) 2003-2005 ( $n = 29$ ), (c) 2006-2009 ( $n = 15$ ), and (d) 2011-2013 ( $n = 18$ ).

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	<i>t</i>	<i>P</i>
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.

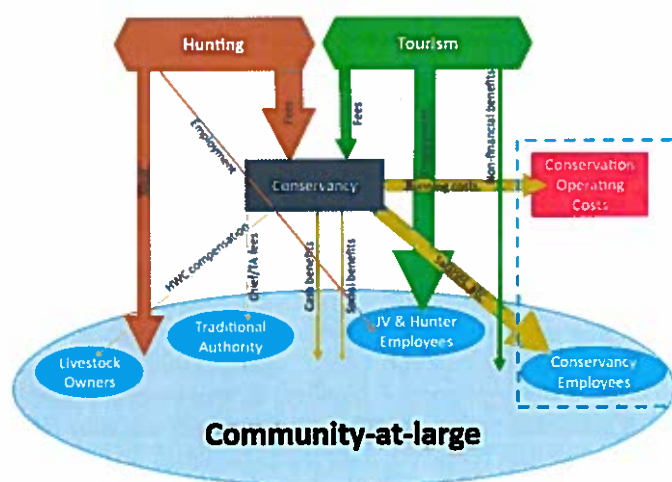


Figure 3. The flow of benefits to various sectors of a stylized local community in Namibia (widths of arrows proportional to dollar values of flows to conservancies from 2011 to 2013; brown, hunting benefit; green, tourism benefit; olive green, flows with a mix of hunting and tourism benefits; dashed 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).



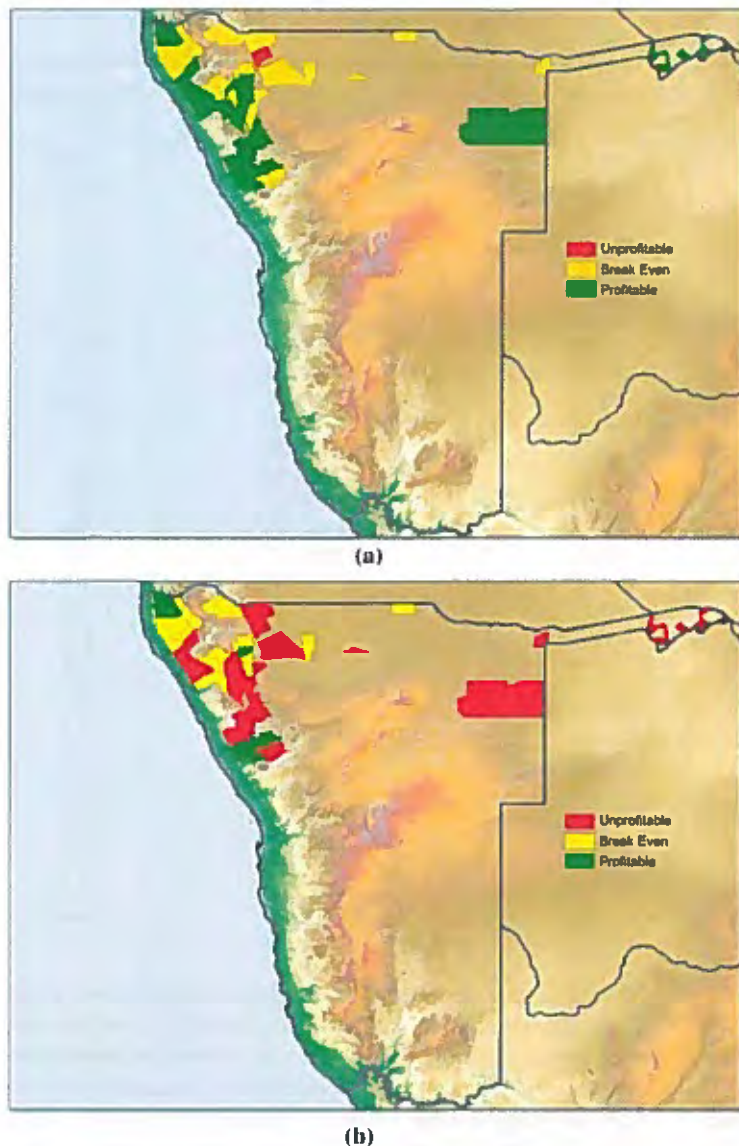


Figure 4. Revenues minus operating costs for 50 communal conservancies for which detailed management cost data were available in 2013 under (a) the status quo and (b) a simulated trophy hunting ban. Break-even conservancies indicate those for which revenues and operating costs are within \$5000 of one 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. 2011b). 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.

<i>Species</i>	<i>Animals bunted</i>	<i>Payment per animal (2013 U.S.\$)</i>	<i>Revenue (2013 U.S.\$)</i>	<i>Percentage of total</i>
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. 2011a; 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. 2013b) 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 dif-

ferences 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' popula-

tions 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. 2011b), evidence on possible negative impacts of trophy hunting on wildlife populations in other parts of Africa (Packer et al. 2010; Lindsey et al. 2013a) 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 (Crosmar 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 dispute. 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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## Short communication

## Local perceptions of trophy hunting on communal lands in Namibia

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## ABSTRACT

Trophy hunting in Africa is currently under pressure as some countries explore various policies that aim to put a halt to an activity that many people in the Western developed world view as unpalatable or unethical. However, in the debate over trophy hunting policy the voices of local communities, who in many instances allow wildlife to persist on the lands they control because of the tangible benefits they derive from it, have been largely unheard. Here, we report on an opportunistic survey of 160 rural residents of Namibia from 32 communal conservancies that generate varying levels of livelihood benefits from wildlife uses, including trophy hunting. About three quarters of these community members were employed in some manner by the conservancy. We used a mixed methods approach to assess community members' perceptions on trophy hunting, the benefits it generates, whether it was "good" or "bad", and how they would respond if trophy hunting were halted. 91% stated they were not in favour of a ban on trophy hunting, and only 11% of respondents would support wildlife on communal lands if a ban were in fact enacted. Most respondents (90%) were happy with trophy hunting occurring on communal lands due to the benefits it provides. These responses were consistent across respondent demographic categories, although those who stand to lose the most (i.e., those employed by or managing a conservancy), viewed trophy hunting in an even more favourable light. Our results suggest that in Namibia, a trophy hunting ban would be viewed very poorly by conservancy residents, and would seriously weaken their support for wildlife conservation. The imposition of trophy hunting policies by countries far from where rural land managers are conserving wildlife would not only restrict communities' livelihood options, but may have perverse, negative impacts on wildlife conservation.

## 1. Introduction

In the debate over trophy hunting that is currently playing out in public and policy spheres (di Minin et al., 2016; Macdonald et al., 2016a, 2016b), the voices of local communities have been conspicuously absent. Local communities are the land managers who will dictate the fate of conservation efforts in large parts of Africa that are outside of protected areas (Roe et al., 2009), therefore policy changes that are likely to impact their wildlife conservation decisions should proceed cautiously and on the basis of the best available scientific information. Yet despite having little understanding of how communities perceive the issue, and of how they may change their land use and wildlife management practices should a major source of livelihood benefits be removed, countries such as Kenya and recently Botswana have banned trophy hunting (Pabst, 2013) while governments of countries in Europe and Australia have stopped or are considering banning the import of trophies of various species (Milman, 2015).

Increasing public opposition to trophy hunting from people living in many developed Western countries may eventually result in the industry being shut down. Yet, a failure to understand how trophy hunting of wildlife and its benefits and costs are perceived by local communities may result in conservation policies that achieve the exact opposite of the intended effect, i.e., a reduction in biodiversity and in the amount of area under wildlife management (di Minin et al., 2016).

To address this gap, we present in this research note the results of a preliminary survey of 160 rural residents across 32 communal conservancies in Namibia, a country in which trophy hunting is a common activity pursued on private, state, and communal lands (Lindsey et al., 2013; Naidoo et al., 2016). Communal conservancies are areas of customary landholdings whose natural resources are managed by local communities for their own benefit, with trophy hunting and nature based tourism being the dominant wildlife-based enterprises that generate livelihood returns (Naidoo et al., 2011a; Naidoo et al., 2011b). These activities, and the communal conservancy program more

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Name of conservancy: Sesfontein Conservancy

Age: < 25 years ☐ 26 to 35 years ☒ 36 to 45 years ☐ 46 to 55 years ☐ 56+ years ☐

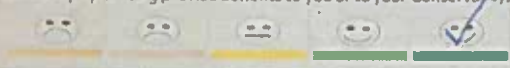
Gender: Man ☐ Woman ☒


• Are you employed by the conservancy? Yes ☒ No ☐

• If yes, as what? ☐ Game Guard ☐ Manager ☐ Secretary ☐ Finance ☒ Other (please specify) Camp Manager

• Are you a Committee Member? Yes ☐ No ☒

• Are you employed by the lodge? Yes ☐ No ☒

• Does trophy hunting provide benefits to you or to your Conservancy?  


• Are you happy that trophy hunting takes place in the Conservancy?  


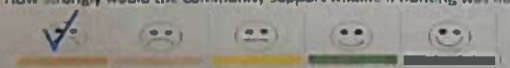
Why is trophy hunting Good?  
It generates income for the conservancy.

Why is trophy hunting Bad?  
It is not bad, but the income generated is not a lot.

• Should trophy hunting be banned? Yes ☐ No ☒

• Is trophy hunting bad for wildlife? Yes ☒ No ☐

• Which is best:  
☐ Tourism only  
☐ Trophy Hunting only  
☒ Both Tourism and Hunting

• How strongly would the community support wildlife if hunting was not allowed?  


• What do you want to say to people who want to ban trophy hunting?  
We rely on trophy hunting for the successful operation of our conservancy, do not ban trophy hunting.

Fig. 1. A completed questionnaire on attitudes towards trophy hunting and a possible ban that was administered to 160 rural residents of communal conservancies in Namibia.

broadly, are recognized as having contributed to dramatic recovery of wildlife populations across the country as well as significant improvements in rural livelihoods (Roe et al., 2009). Trophy hunting can generate substantial benefits for local communities (Naidoo et al., 2016). These include revenues for conservancy management (typically between 30 and 75% of a trophy price), jobs for local community members at hunting camps, and perhaps most importantly, meat distribution to all community members. However, less positive aspects of trophy hunting can include low or inequitable distribution of benefits from hunting operators to local communities, poor skills among community members to fully participate in the hunting industry, and questions about the ecological sustainability of hunting (Suich, 2010; Yitbarek et al., 2013; Lindsey et al., 2006a, 2006b).

## 2. Materials and methods

We employed a mixed methods survey approach (Johnson et al., 2007), using an in-person interview comprising both closed and open-ended questions that asked community members for their feelings on trophy hunting (Fig. 1), for reasons why hunting is either “good” or “bad” for themselves or their communities, and their thoughts on a possible trophy hunting ban. Using a 1-to-5 Likert scale (colour-coded and represented by “smiley” faces to facilitate understanding by rural residents), we asked conservancy members to rate their support for trophy hunting, the level of benefits it provides to themselves or the local community, and what their degree of support for wildlife conservation would be if trophy hunting were banned on their lands. Open-ended questions allowed respondents to voice why they thought hunting was good or bad, and whether it should or should not be

banned. We additionally collected basic demographic and livelihood information from respondents. These short surveys were deployed opportunistically in January and February 2016, at which time communal conservancies were holding annual audits that involved conservancy members and staff gathering to discuss the management of their lands and wildlife. During this time, we approached conservancy employees (game guards and management committee) and non-employees (those not directly employed by the conservancy) to participate in the survey. All participants approached took part willingly and without any refusals. The 32 communal conservancies that were surveyed represent a wide geographic spread across the western (Kunene) and eastern (Zambezi) regions of Namibia, and also span conservancies that derive various levels of livelihood benefits from trophy hunting ( $n = 13$  conservancies), nature-based tourism ( $n = 3$ ), both activities ( $n = 12$ ), or neither ( $n = 4$ ).

We modelled the degree of agreement with the question “Does trophy hunting provide benefits to you or your conservancy?” as a function of region (dummy variable “Zambezi” in Tables 2–4), respondent age (4 levels, with reference category over 50 years old, and dummy variables for less than 25 - “age25”, 26 to 39 years old - “age26\_39”, and 40–49 years old, - “age40\_49”, sex (“male” dummy variable), occupation (dummy variables for committee member - “committee”, game guard - “game.guard”, or general conservancy employee - “employee”), and whether they lived in a conservancy that currently hosts trophy hunting operations (“some.hunt.inc” dummy variable). Because the data were dominated by responses in the “agree” and “strongly agree” categories (i.e., categories 4 and 5), we collapsed these two categories into an “agree” category, with categories 1 to 3 folding into a 0 or “do not agree” category. We then conducted Bayesian logistic regression, with this agree/do not agree variable as our dependent variable, uninformative priors on the independent variables, and using two chains with 500 warm up samples and 1500 posterior samples each. This analysis was conducted using package brms (Buerkner, 2016) in the statistical computing software R (R Development Core Team, 2008). For consistency, we used the same procedure to model responses to the questions “Are you happy that trophy hunting takes places in the conservancy?” and “How strongly would the community support wildlife if hunting was not allowed?”. For all three models, we evaluated the strength of evidence of independent variables using 95% Bayesian credible intervals, where intervals that do not overlap with zero are taken as strong evidence of a variable's impact on the dependent variable in question.

### 3. Results

Across all respondents ( $n = 160$ ), an overwhelming majority (91%) of respondents stated they would not be in favour of a ban on trophy hunting, and only 11% of respondents believe their community would continue to support or strongly support wildlife on communal lands if a ban were in fact enacted. In response to the open-ended question “What would you say to those who want to ban trophy hunting”, two-thirds (65%) stated that ‘this would be depriving them of income or employment that is critical for their livelihoods’ (Table 1). Smaller fractions mentioned ‘the loss of meat’ (14%), ‘a resulting increase in human-wildlife conflict’ and retaliatory killing of wildlife (6%), and an increase in poaching (6%) as possible outcomes of a trophy hunting ban. A small percentage (13%) were open to a trophy hunting ban, but did not see what other alternatives could replace the lost benefits that a ban would entail.

Most respondents strongly agreed that trophy hunting provides benefits to communities and were happy with it taking place on communal lands (Fig. 2), although 18% ( $n = 28$ ) of respondents are concerned that trophy hunting is in fact bad for wildlife. The most common reason given by these respondents for why trophy hunting was bad (see also Table 1) was “the potential for wildlife declines” (mentioned by  $n = 12$  people), followed by “few actual benefits” ( $n = 5$ ), and

Table 1

Statements to open-ended questions on why trophy hunting is good, why trophy hunting is bad, and response to a possible ban on trophy hunting.

What would you like to say to people who want to ban trophy hunting?
“Trophy hunting is lifting us from poverty. It creates employment opportunities for us. We also give meat benefits to our members”.
“We want to conserve our wildlife and use it in a sustainable manner, but the benefits need to go to the general members”.
“Please give us a reason for wanting to take us back to being poor and with no benefits from our wildlife. I need an explanation of why it is good for photographers to benefit but not for us”.
“Why do you want to take away my job? Why do you want me to suffer from elephants destroying my crops without any benefits. Just so you can satisfy your needs of looking at these animals? Trophy hunting is well managed and beneficial for us, we cannot ban it”.
“Trophy hunting is our means of conservation and survival. Our members benefit, our wildlife is well guarded against poaching, why ban a good thing?”
“If hunting stops, we will be left with nothing (no money, jobs or meat to the people). Then poaching will escalate”.
“Trophy hunting improved our living conditions, it helps alleviate poverty. If it is banned, the community will revert to illegal hunting”.
“We suffer a lot from conflict with wildlife, especially with Hippos. Trophy hunting helps reduce this conflict while investing back into the community”.
“If we are to stop trophy hunting, what alternatives would we have? Trophy hunting is our only source of income at the moment”.
“Yes, please ban trophy hunting, tourism is better. Our grandchildren will not find wildlife outside national parks if we continue hunting”.
Why is trophy hunting good/bad?
“It brings income into our community and also creates employment opportunities”.
“It brings money and meat to our conservancy, this prevents poaching”.
“It generates income which allows for the operation of our conservancy”.
“It brings income into our conservancy, creates employment for the people, pays salaries and gives the meat to the people”.
“It brings income to our association, enabling us to install water pumps for the communities and support local schools”.
“It benefits people which helped in curbing poaching and retaliatory killing of wildlife. It is selective, only takes out old and post-reproductive male animals”.
“It is a beneficial way of controlling wildlife numbers especially problem animals. We benefit greatly from trophy hunting, both from meat and money”.
“Trophy hunting chases animals away from the people and from the area. It will also reduce our wildlife numbers in the near future”.
“It is taking place every single year, this will reduce our wildlife in the long run”.
“The benefits are only enjoyed by a few individuals within the community”

“possible negative effects on tourism” ( $n = 2$ ). One person mentioned “wounding of animals” as an issue and one person mentioned that “hunting makes animals more aggressive towards people”. Importantly, the ethical concerns of hunting individual animals for sport that are mentioned by wealthy people living in developed western countries as justification to stop trophy hunting were not mentioned at all by local community members living with wildlife.

A strong majority of respondents, were happy with trophy hunting operating on their communal lands, whether actually occurring at present or not (Fig. 2). 90% of respondents either agreed or strongly agreed with the question “Are you happy that trophy hunting takes place in the conservancy?”. The dominant reason given by respondents for why trophy hunting was good (see also Table 1) was that it generated income or employment for themselves or community members (85%). Other reasons for why hunting was good was the meat it provides (46%), the fact that it is well managed and has little impact on wildlife (5%) and the removal of problem animals (3%).

Parsing out the dependent variables by employed versus non-employed at the conservancy (Fig. 3), we find that strong majorities of employees (89%)  $n = 110/118$  and non-employees (88%) ( $n = 35/40$ ) believe their community would not support wildlife on communal lands if a ban were enacted. An overwhelming majority of both employees (93%) and non-employees (88%) are happy with trophy hunting taking place in the conservancy while 91% of employees and 58% of non-employees agreed that trophy hunting provides benefits to communities. Although non-employees do not view benefits from trophy hunting as highly as do conservancy employees, they



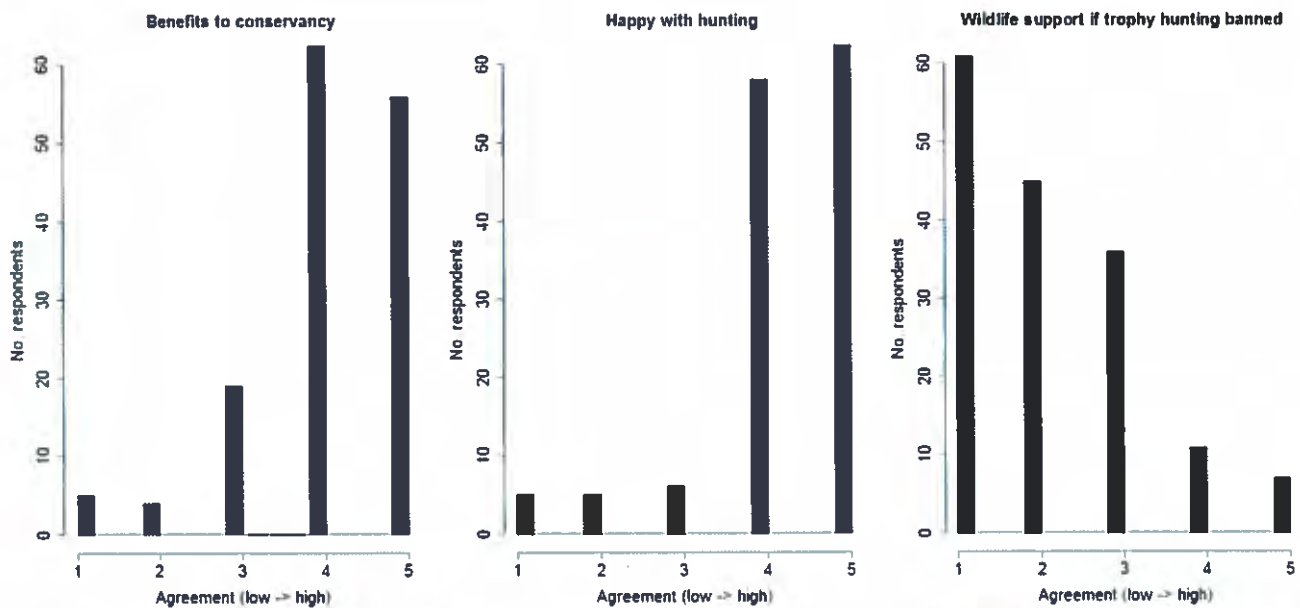


Fig. 2. Histogram of responses to the questions "Does trophy hunting provide benefits to you or to your conservancy?" (left panel), "Are you happy that trophy hunting takes place in a conservancy?" (middle panel), and "How strongly would the community support wildlife if hunting was not allowed?" (right panel).

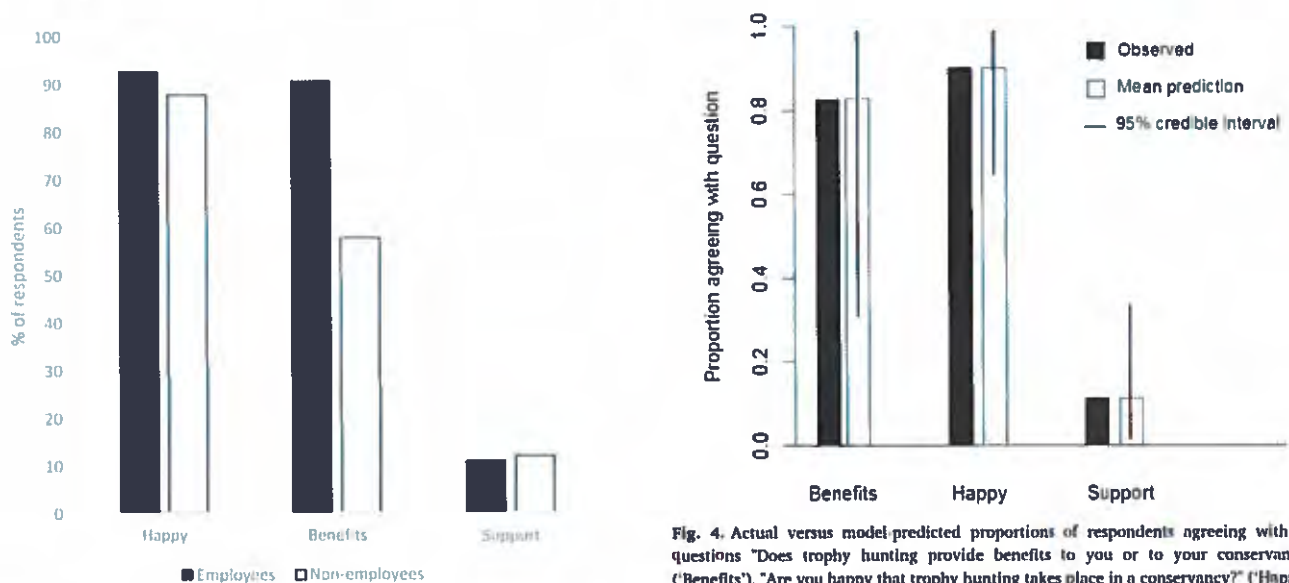


Fig. 3. Employed versus non-employed responses to the questions "Are you happy that trophy hunting takes place in a conservancy?", "Does trophy hunting provide benefits to you or to your conservancy?" and "How strongly would the community support wildlife if hunting was not allowed?".

nevertheless support trophy hunting at a similar level, and are similarly pessimistic about future support for wildlife conservation if trophy hunting were ever to be banned.

All of the Bayesian regression models converged appropriately and posterior predictive checking showed that they were able to generate predicted values that looked similar to the actual data (Fig. 4). The model for trophy hunting benefits generation correctly classified 70% of the respondents who did not agree that trophy hunting produced benefits, and 82% of those who did agree. For happiness with trophy hunting operations, the model correctly classified 67% of those who were happy and 56% of those who were not happy with hunting on conservancy lands. Finally, for continued support of wildlife

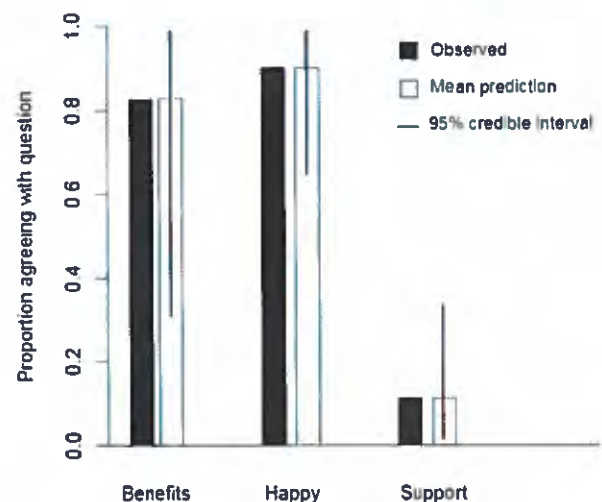


Fig. 4. Actual versus model-predicted proportions of respondents agreeing with the questions "Does trophy hunting provide benefits to you or to your conservancy?" ('Benefits'), "Are you happy that trophy hunting takes place in a conservancy?" ('Happy'), and "How strongly would the community support wildlife if hunting was not allowed?" ('Support').

conservation, 69% of individuals who would no longer support wildlife were correctly classified, while 56% of those would support wildlife conservation were correctly classified.

Demographic variables (age and gender) and the type of conservancy (those currently generating benefits from trophy hunting versus not) were not important factors predicting how favourable respondents' views were on the benefits that trophy hunting can generate for themselves or their community (Table 2). However, employees of conservancies and committee members ( $n = 120$ ) were more likely to agree that trophy hunting produces benefits for themselves or their community than those not employed by a conservancy (Table 2). In addition, respondents from the Zambezi region were more likely to agree that trophy hunting provided benefits to the community, probably because hunting operations are more widespread there than in the Kunene region.

Table 2

Results from a Bayesian logistic regression of agreement that benefits are generated from trophy hunting, with variables whose 95% Bayesian credible interval does not overlap with zero in bold.

	Estimate	Est. error	l-95% CI	u-95% CI	Eff. sample	Rhat
Intercept	-1.70	1.23	-4.14	0.62	3036	1
Age25	0.43	1.20	-1.81	2.95	2732	1
Age26_39	0.31	0.78	-1.30	1.77	2857	1
Age40_49	-0.30	0.81	-1.94	1.22	2576	1
Some.hunt.inc	-0.37	0.69	-1.76	0.99	3583	1
Male	0.79	0.61	-0.40	1.99	4000	1
Committee	1.81	0.76	0.42	3.38	3120	1
Game.guard	0.38	0.69	-0.92	1.80	3849	1
Employee	2.33	0.69	1.04	3.70	3342	1
Zambezi	1.97	0.67	0.69	3.28	3011	1

Table 3

Results from a Bayesian logistic regression of happiness with trophy hunting operations, with variables whose 95% Bayesian credible interval do not overlap with zero in bold.

	Estimate	Est. Error	l-95% CI	u-95% CI	Eff. Sample	Rhat
Intercept	-0.47	1.30	-2.94	2.21	3011	1
Age25	1.59	1.61	-1.17	5.20	2685	1
Age26_39	0.85	0.88	-0.94	2.50	2626	1
Age40_49	0.25	0.91	-1.57	1.92	2664	1
Some.hunt.inc	-0.62	0.92	-2.47	1.09	4000	1
Male	0.79	0.66	-0.50	2.13	4000	1
Committee	2.07	0.87	0.47	3.89	2844	1
Game.guard	1.08	0.84	-0.52	2.78	4000	1
Employee	1.45	0.74	0.05	2.96	3388	1
Zambezi	1.14	0.78	-0.41	2.67	3216	1

Table 4

Results from a Bayesian logistic regression of support for wildlife conservation in the event of a trophy hunting ban, with variables whose 95% Bayesian credible interval do not overlap with zero in bold.

	Estimate	Est. error	l-95% CI	u-95% CI	Eff. sample	Rhat
Intercept	-2.55	1.63	-6.09	0.21	1874	1
Age25	1.32	1.89	-2.52	5.24	1934	1
Age26_39	2.39	1.37	0.25	5.48	1584	1
Age40_49	1.03	1.50	-1.45	4.39	1804	1
Some.hunt.inc	-2.73	1.06	-4.90	-0.74	3033	1
Male	0.35	0.66	-0.92	1.67	4000	1
Committee	-1.22	0.77	-2.80	0.23	4000	1
Game.guard	-1.42	0.78	-3.03	0.05	3731	1
Employee	0.87	0.79	-0.57	2.50	4000	1
Zambezi	0.58	0.96	-1.20	2.56	3415	1

Age and gender variables were again not important predictors of responses to the questions on happiness with trophy hunting operations, however employees and committee members were more likely to be happy with trophy hunting than those not employed by the conservancy (Table 3). For support of wildlife conservation, gender and the type of conservancy were not important in explaining community support for wildlife in the event of a trophy ban, but the few respondents who would continue to support wildlife were more likely to be in the 26–39 age range rather than older than 50. In addition, respondents in conservancies with current trophy hunting operations would be even less likely to continue to support wildlife conservation in the event of a trophy ban than respondents in conservancies where hunting is not currently taking place (Table 4).

#### 4. Discussion

This preliminary work suggests strong support for trophy hunting among conservancy members, especially those employed by or managing the conservancy. The data also suggest a large drop-off in support

for wildlife conservation in the event of a hunting ban, a result which appears particularly acute in those conservancies currently realizing livelihood gains, in the form of meat and income for conservancy management, from trophy hunting operations. Most respondents believed that trophy hunting was “good”, listing the immediate livelihood gains they realize as a result of hunting, and that would be lost due to a ban. Smaller fractions mentioned the potential negative effects on wildlife of a trophy hunting ban, including increases in poaching and retaliatory killings of problem animals. Fewer than 1 in 5 respondents felt trophy hunting was “bad”, and while these respondents expressed concern for potential population declines of wildlife due to hunting, they did not mention concerns for the welfare of individual animals. This contrasts sharply with views in wealthy Western countries, where outrage over the killing of individual animals, illustrated vividly by the response to the shooting of Cecil the lion in Zimbabwe, appear to be driving policies that are making trophy hunting in Africa more difficult (Macdonald et al., 2016a, 2016b; di Minin et al., 2016; Novelli et al., 2006).

Results from elsewhere in Africa also suggest that where tangible benefits are received, either via nature-based tourism or from hunting, local communities have more favourable attitudes towards wildlife. In central Kenya, where trophy hunting has been banned since 1977, a majority of local community members would support the return of trophy hunting, and benefits derived from trophy hunting or tourism was the most-cited reason given for how they could better co-exist with predators (Romanach et al., 2007). The likelihood or not of receiving benefits was also the primary concern of residents asked for their opinion on elephant reintroduction to group ranches in Kenya (Browne-Nunez et al., 2013). In both Zambia and Zimbabwe, where community-based conservation programs have relied heavily on trophy hunting as a source of benefits for impoverished rural communities, the major conservation outcome of these programs was that community attitudes became more favourably predisposed towards wildlife (Leader-Williams and Hutton, 2005; Lewis and Alpert, 1997; Loveridge et al., 2006). And in Tanzania, respondents who received more meat from hunted animals were more likely to have positive conservation attitudes than those who received less meat (Gillingham and Lee, 1999). Given that large areas of Africa are outside of protected areas and unsuitable for nature-based tourism (Lindsey et al., 2006a, 2006b), it is imperative that communities who control natural resources in these areas and who benefit from well-managed trophy hunting operations are encouraged, rather than dis-incentivized, to support wildlife conservation.

Our survey was conducted opportunistically during community meetings and was restricted to conservancy members. A large number of respondents were employed in some manner by the conservancy, and employment-related variables were significant predictors of responses on benefits generated from, and satisfaction towards, trophy hunting. Given that our sample is biased towards respondents who are associated with conservancies, future work should sample a broader sample of rural residents to determine whether rural communities at large in Namibia share these same views.

#### 5. Conclusion

Our data gives a voice to the viewpoints of local communities on the trophy hunting debate, a debate in which they have been almost entirely ignored even as policy decisions made overseas threaten substantial negative impacts on their livelihood options. They also support research, both from Namibia and from other parts of Africa, that emphasizes the importance of benefits from hunting for local communities, which leads to economic incentives for conservation in communal lands outside of formal protected areas (Störmer, 2016; Hoole, 2008; Loveridge et al., 2006; Naidoo et al., 2016; White and Belant, 2015). Imposing policies in rich, Western countries that cut off these livelihood gains, without an in-depth understanding of how local community land managers may react, risks generating unintended consequences that

could result in negative conservation outcomes.

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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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## N#a-Jaqna Conservancy

Named after the Buffalo Thorn Tree

### Quick facts

Registered:	July 2003
Region:	Otjozondjupa
Area:	9,120 km <sup>2</sup>
Approximate population:	3,698
Geographical features:	Average annual rainfall of 400-450 mm. Kalahari sands cover flat landscape of broadleaf and acacia woodland.



Quick links

- Ministry of Environment and Tourism (MET) website
- MET regional offices
- Photo Library



Conservancy chairpersons' forum

NACSO full members

- IRDNC
- LAC
- NDT
- CCF
- MRCC-UNAM
- » See all NACSO members

NACSO partners

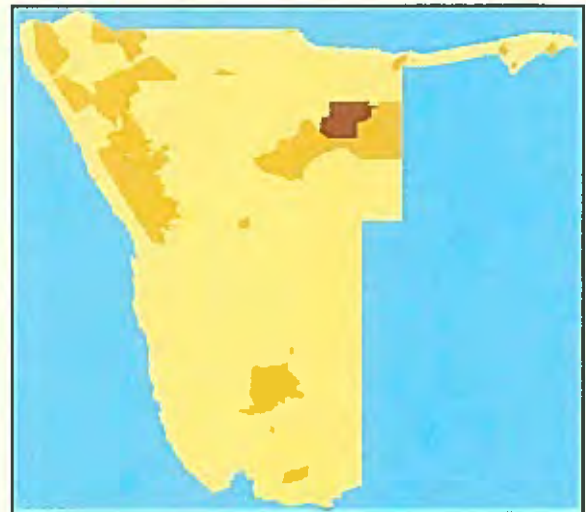
- Funding partners
- Hunting partners
- Tourism partners
- Government Agencies

Where we are

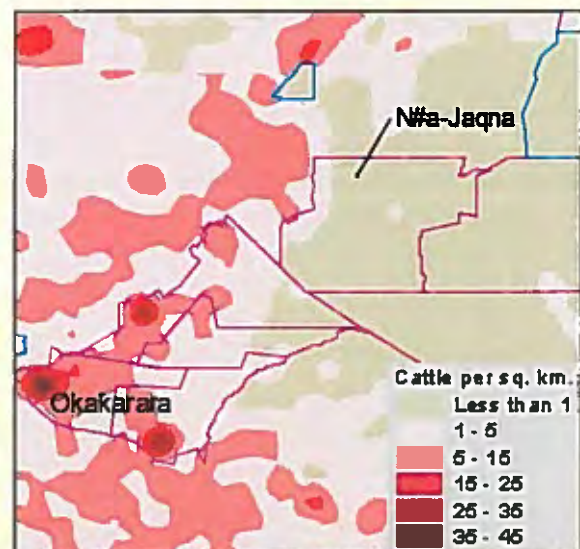
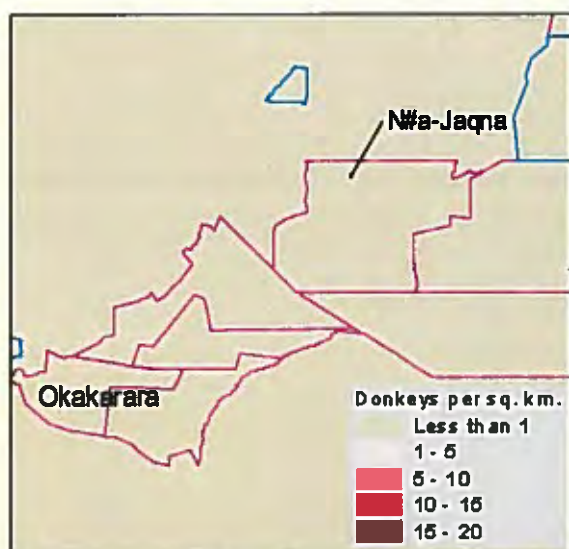
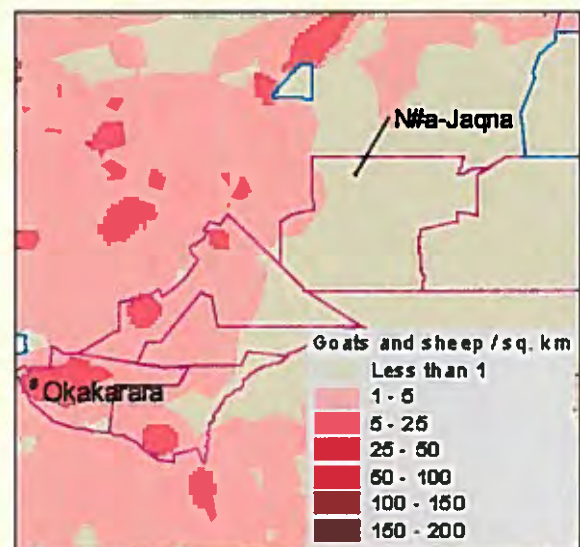
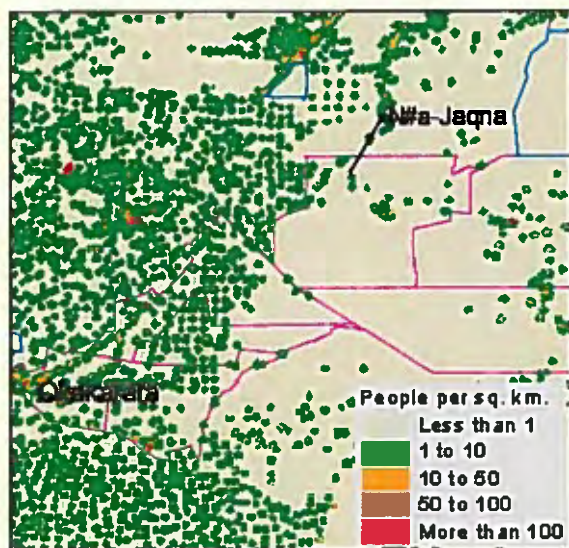
Location of...



**Name:** N#a-Jaqna  
**Registered:** July 2003  
**Size:** 9120 km<sup>2</sup>  
**Region:** Otjozondjupa  
**Members:** 782  
**Annual rainfall:** 400 – 500 mm  
**Landscape:** Kalahari Sandveld.  
**Biome:** Savanna.  
**Vegetation type:** Northern Kalahari.  
**Key wildlife species:** Elephant, eland, kudu, oryx, leopard.  
**Terrestrial diversity:** Moderately low to average.  
**Terrestrial endemism:** Very low.



Non-wildlife poulation densities in and around N#a-Jaqna conservancy.  
State protected areas are outlined in blue, conservancies in purple.





## Status Summary & Natural Resource Report

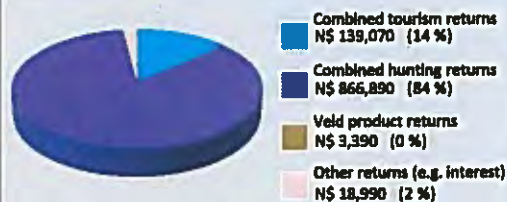
maximising wildlife returns by minimising threats...

### 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\$ 1,028,340**



**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\$ 1,028,340
--------------------	---------------

Employment	Private Sector		
	Conservancy	13 staff	N\$ 221,740

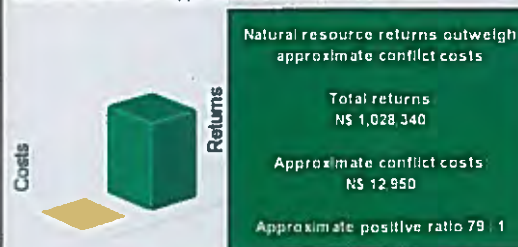
### Cost of natural resource conflicts in 2016

estimates are based on average national values

Estimated human wildlife conflict cost	N\$ 3,330
Estimated poached high value species loss	N\$ 9,820
<b>Total conflict cost estimate</b>	<b>N\$ 12,950</b>

### Natural resource cost–return ratio in 2016

the chart shows the approximate ratio of returns to costs



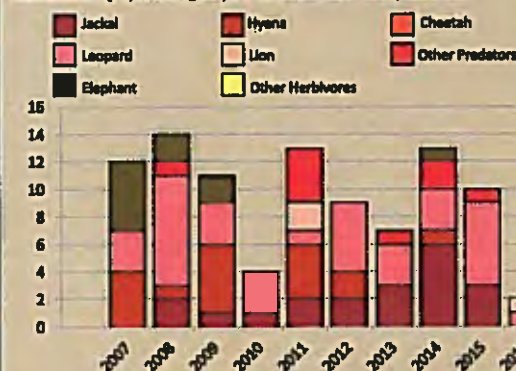
### Management performance in 2016

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 m/ment	
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

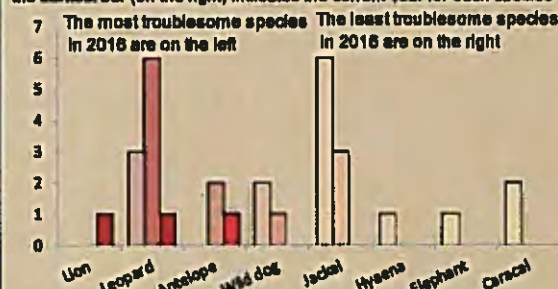
### Human wildlife conflict trend

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

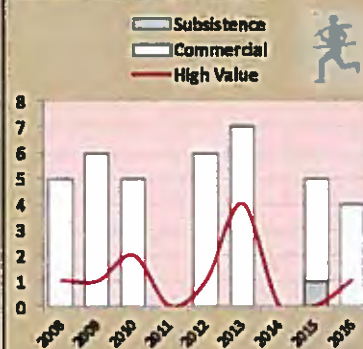
the chart shows the number of incidents per category for the last 3 years; the darkest bar (on the right) indicates the current year for each type



## Poaching

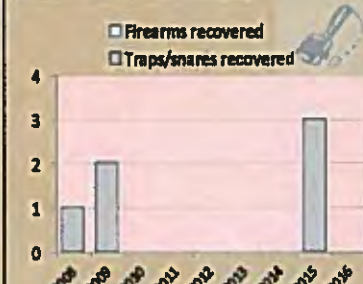
## Number of incidents per year

Commercial poaching is a serious threat to conservancy benefits. The chart shows the number of incidents per category



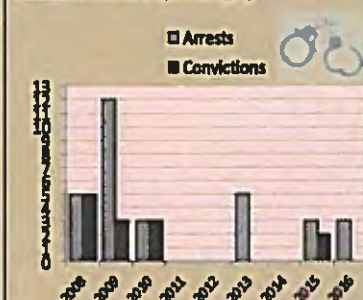
### Traps and firearms recovered

number of incidents per category



### Arrests and convictions

number of incidents per category



## Wildlife removals – quota use and value

[illegible]



## monitoring numbers and trends for a healthy conservancy...

## Current wildlife numbers and status

Species	Animals Seen 2016	Estimated population range	Wildlife Status		
			Count Trend	National Guideline	Desired Status
Duker					
Elephant					
Gemsbok					
Giraffe					
Jackal					
Klipspringer					
Kudu					
Mn. zebra					
Ostrich					
Springbok					

## Wildlife Status

Count trend – gives the species status in the conservancy based on game count trend data.

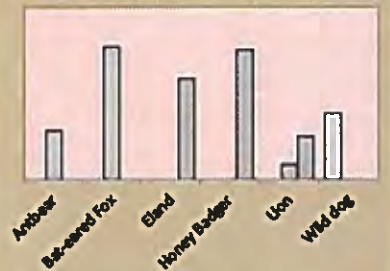
National guideline – gives the species status in the conservancy using national guidelines for the conservancy; for example, lions may cause local problems, but are of high value and are rare at landscape level.

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.

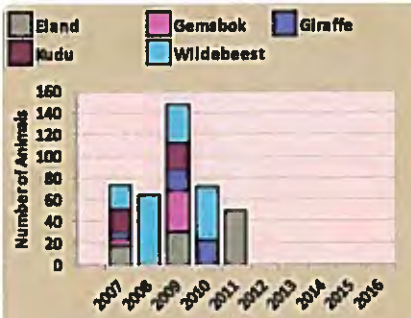
## Locally rare species

Sightings Indicator □ 2014 □ 2015 □ 2016

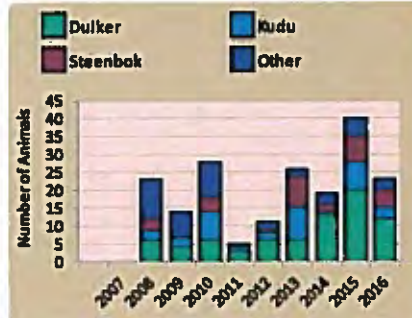


Locally rare and endangered species are not found very often in the conservancy and need special conservation attention.

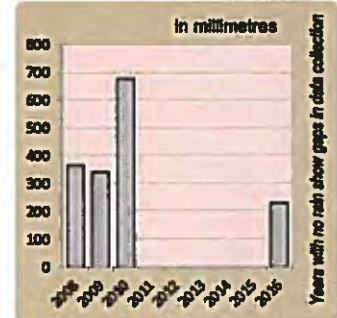
## Wildlife introductions



## Wildlife mortalities



## Annual rainfall

Annual game count *currently not done*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*



# 2016 Annual Conservancy Audit Report

## N#a Jaqna 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:	July 2003
Population (2011 census):	3540
Size (square kilometres):	9123

#### Conservancy Governance

Number of management committee members:	8
Date of last AGM:	Wed, July 27, 2016
Attendance at AGM:	Men: 25; Women: 25
Date of next AGM:	Wed, February 1, 2017
Other important issues	
Budget approved?	✓
Work plan approved?	✗

#### Constitutional adherence

Approved constitution	✓
AGM held	✓
Management and utilisation plan	✗
Financial annual report approved at AGM	✓
Financial report external review	✓
Benefit distribution plan	✓



#### Employment

Conservancy staff: Male	12
Female	1
Community game guards:	9
Community resource monitors:	0
Lodge staff: Male	0
Female	0

#### Benefits

Cash In Kind

Other Benefits

#### 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			✓	Implementation of the programme in the conservancy is helping to manage resources.
Zonation Plan		✗		Our wildlife and the area needs to be protected by both MET/MLR.
Benefit Distribution		✗	1346	





**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. 1A  
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 <b>MESTOUSIS</b>	1.b. First Name <b>PANTELI'S</b>	(b) (6)
(b) (6)	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.b. City <b>Pelham</b>	1.c. State <b>NY</b>	1.d. Zip code/Postal code (b) (6)	1.e. County/Province	1.f. Country <b>USA</b>
2.a. Mailing address (include if different than physical address, include name of organization)				
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>5/4/18</b>	
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)?

PETER MESTOJIS,

(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.

b. Sex (if known).

elephant

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, Kwalata wilderness  
200 km North of Pretoria, 90 km North-west of Naboomspruit and  
353k Due North of Vaalwater in Waterberg Mtns of the northern province  
of South Africa

b. Date wildlife is to be hunted: 01 August 2018 Thru 14 August 2018

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

Numzaan Safaris out of Thabazimbi, South Africa

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). *HAVE NOT HUNTED YET. PERMIT HAS BEEN APPLIED FOR.*

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. BREDEL, P.O. BOX 30093 JET PARK WITFIELD 1467*

City:

State/Province: *GAUTENG*

Country, Postal Code: *1623, SA*

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*

## Kwalata Wilderness CC

Reg. Number: 2004/061510/23 Tel: +27  
(0)14 755 4104



Vat  
Number: 4530231937 Fax: +27  
(0)14 755 4249

KW

P.O. Box 485 E-

mail: [office@kwalata.com](mailto:office@kwalata.com)

Vaalwater Web: [www.kwalata.com](http://www.kwalata.com)  
0530  
South Africa

25.04.2018

ATT: USFWS & NUMZAAN SAFARIS - Mr. Mestousis

### **ELEPHANT CITES EXPORT TO U.S.** **IMPLICATIONS OF THE ELEPHANT HUNT ON THE PROPERTY** **KWALATA WILDERNESS.**

In response to No 9 of the USFWS document and the requested import of the elephant trophy into the USA:

- The elephant bull to be hunted by Mr. Mestousis with Numzaan Safaris is currently on a property where the herd population is too great for the 6 000 hectares on which the herd roams. Bio-diversity and Nature Conservation, South Africa, under the Norms and Standards require that Kwalata Wilderness purchases more land to sustain the 20 odd herd. This is not financially an option for us and in the current political climate it is even less attractive to own land in South Africa.
- Thus according to the Norms and Standards the elephants must be culled as the number of females alone exceeds the carrying capacity of 7 elephants the prescribed number for the land. In the interim before they issue the final cull permit we have been given permission to hunt elephant bulls to reduce the population and preserve the environment.
- We are also looking to find a home for these elephant cows and juveniles in Mozambique however funding, transport and available areas are limited. South African land available to elephant is currently at capacity and South Africa has little or no need for animals to be relocated internally.
- The bull in question needs to be removed as the new bull brought in 5 years ago from another blood line must mate with the females to change the genetic of this 27 year old herd (on Kwalata).
- We have attached along with this letter the Management Plan showing the amount of research that is required to have elephant on a property as well as the letter from Nature Conservation stating their requirement to cull.

#### **No 9a: SA Population Status:**

South African land that can carry elephant is at its capacity hence the only possibility that elephant can be relocated is to Mozambique to the newer parks that they are trying to establish there.

According to the available CITES document the elephant population in South Africa have increased from 120 in 1920 to 12 000 currently (there is no date on the available CITES document). It also states that "the elephant population in SA in protected areas is under no major threat".

According to the EWT "Elephant numbers in South Africa increased by approximately 26.8% between 2002 (14,071 elephants) and 2006 (17,847 elephants). Since 2006 there has been an approximate increase of 41% in South Africa's elephant population.

**No 9b: Distribution of funds.**

The funds from the elephant hunt will be used in part to recuperate and rejuvenate the property from elephant damage. 23/5/2018 a 4-bay thatched roof garage and entrance to the lodge was destroyed by an elephant bull. We have a 4 000 dollar insurance bill from the damage to a guests vehicle as well as numerous other damages to roofs, water tanks etc by the elephant. Funds will be used to continue to preserve the wilderness that forms Kwalata Wilderness and safeguard the future of its employees and other wildlife. Meat is also sent to two local orphanages namely the Bushveld Mission and The Fold which are home to mostly AIDS orphans.



**No 9c: Conservation benefit.**

As previously mentioned the carrying capacity and prescribed number of elephants that can be sustained by the property is 7 adult elephants. Thus the 20 strong herd has been listed to be culled. In the interim while we hope to sell the property to a new owner who may have the financial resources to increase the land or to relocate the cows and juveniles to Mozambique (new genetics in bulls would be best for the herd) are the best options in the interim before the cull permit is finally issued.

The land in the interim needs to be protected from the devastation of the bulls particularly when they are in musth (at their most aggressive and destructive) and the general feeding requirements of the herd. Already the species of Paper Bark Tree and most Aloe species have been removed by the elephant from this 6 000 hectare property.

We hope that you will assist Numzaan safaris client with the importation of his trophy harvested out of the necessity of land and law and in the interests of economic sustainability.

Many thanks  
Yours sincerely

A handwritten signature in black ink, appearing to read 'Reinhard Heuser'.

Reinhard Heuser  
Owner Kwalata Wilderness



**LIMPOPO**

**PROVINCIAL GOVERNMENT**  
REPUBLIC OF SOUTH AFRICA

Enquiries: Mr. E. T Moeng  
Cell: 0824126898  
Email: moenget@ledet.gov.za

Mr G de Klerk  
Ecological Advisor: Kwalata Private Nature Reserve  
Envirodel Ecological and Wildlife Management Services  
Private bag X9700  
Polokwane  
0700  
082 805 8947

09 March 2017

**APPROVAL OF ELEPHANT MANAGEMENT PLAN AND CULLING PLAN –KWALATA PRIVATE NATURE RESERVE**

1. Your document "Elephant Management Plan and Culling plan – Kwalata Private Nature Reserve 2016 has reference.
2. Please be advised that the Member of the Executive Council Mr. S.C. Sekoati has approved the Elephant Management Plan and Culling plan for Kwalata Private Nature Reserve on the 07<sup>th</sup> of March 2017.
3. This plan is approved in terms of the requirements of the National Norms and Standards for the Management of Elephants in South Africa (2008).
4. All future permit applications related to elephant management for this reserve will be evaluated according to the content of this approved management plan and culling plan.

Kind regards,

E.T. Moeng: Director: Biodiversity Management

20 Hans van Rensburg Street, POLOKWANE, 0700, Private Bag X9484, POLOKWANE, 0700  
Tel: (015) 293 8300, Fax: (015) 291 4107 Website: <http://www.limpopo.gov.za>

***The heartland of Southern Africa - development is about people!***

<sup>1</sup> South Africa 2008. National Environmental Management: Biodiversity Act, No 10 of 2004. National Norms and Standards for the Management of Elephant in South Africa. Government Gazette, 25 1 (30833), February 29:1-40

**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: 5/4/18

*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  
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: 1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

Type of Activity

**IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN  
AFRICAN LEOPARD AND NAMIBIAN SOUTHERN WHITE  
RHINOCEROS**

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 <b>BUNNEY</b>	1.b. First Name <b>RAYMOND</b>	1.c. Middle Name/Initial <b>(b) (6)</b>	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number	3.a. Alternate Telephone Number	

**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 Post Office Box) <b>(b) (6)</b>			
1.b. City <b>LIBERTY LAKE</b>	1.c. State <b>WA</b>	1.d. Zip code <b>(b) (6)</b>	1.e. Country <b>U.S.A.</b>
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. Country/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)
<b>Ray</b> <b>(b) (6)</b> <b>Bunney</b>

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND  
NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** *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 4:** Certain hunting trophies, including leopard 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.

- Complete all questions on the application.
- Mark questions that are not applicable with "N/A".
- If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.
- 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):
- a. Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20.
  - b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia  
Quantity:        (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).
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 ANIMAL HAS ALREADY BEEN TAKEN, please enter the following:**

- d. 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:

M'BARAGANDU BLOCK - SOUTH of Sibus Game Reserve  
TANZANIA EAST AFRICA, TRANSPORTED to DAR ES SALAAM,  
TANZANIA

- e. Date wildlife was hunted:

OCT 20, 2017 / NOV 9, 2017

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

MARK SULLIVAN - NITRO EXPRESS SAFARI'S

- g. 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]:

Game FRONTIERS TANZANIA  
PO BOX 20965  
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).

8. Complete name and address of overseas person or business shipping the trophy to you.

- a. 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: SHENI LALJI  
Business Name: Game FRONTIERS TANZANIA  
Address: PO BOX 20965  
Address:  
City: DAR ES SALAAM  
State/Province:  
Country, Postal Code: TANZANIA EAST AFRICA

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. 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: \_\_\_\_\_



10. 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: 6-5-2018

*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.*

11. 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  
U.S. Fish and Wildlife Service

RCVD JUN 20 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 <b>GAGLIO</b>	1 b. First Name <b>ANTHONY</b>	1 c. Middle Name/Initial	1 d. Suffix
2 a. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	2 b. Telephone Number	3 a. Alternate Telephone Number	4 E-mail address <b>MATT@GENUSLOGISITCS.COM</b>


## 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>(b) (6)</b>				
1 b. City <b>STAMFORD</b>	1 c. State <b>CT</b>	1 d. Zip code/Postal code <b>(b) (6)</b>	1 e. County/Province <b>US</b>	1 f. Country <b>US</b>
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)  6/14/18	
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.

MATT MAYERS 161-15 ROCKAWAY BLVD, JAMICA,NY 11434

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

MATT 718-7900216 MATT@GENUSLOGISTICS.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.  
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:

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:

NAMIBIA NYAE CONSERVANCY,

b. Date wildlife was hunted:

NOV 8, 2017

11/8/2017



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

S.M JACOBS

- 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]:

STEPHEN M JACOBS  
PO BOX 601  
GROOSRIEN, NAMIBIA

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). 175910 CITES
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: STEPHAN M JACOBS  
Business Name:  
Address: PO BOX 601  
City: GROOSRIEN  
State/Province:  
Country, Postal Code: NAMIBIA

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: \_\_\_\_\_

*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).



CONVENTION ON  
INTERNATIONAL TRADE IN  
ENDANGERED SPECIES OF  
WILD FAUNA AND FLORA


PERMIT / CERTIFICATE No.

0056412

Original

☒ EXPORT  
☐ RE-EXPORT  
☐ IMPORT  
☐ OTHER:

2 Valid until

1 Importer (name and address) (b) (6) (b) (6) (b) (6)			4 Exporter / Re-exporter (name, address and country)  Signature of the applicant: <i>[Signature]</i>				
3a Country of import			6 Name, address, national seal/ stamp and country of Management Authority   <b>MINISTRY OF ENVIRONMENT AND TOURISM</b> Directorate: Scientific Services Private Bag 13306 Windhoek NAMIBIA				
5 Special conditions  All imports and exports remain subject to veterinary regulations. 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.			5b Security stamp No.				
7/B 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	
7/B. <i>[Faint text]</i>		9. <i>[Faint text]</i>		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 ***
12.				12a.			12b.
7/B. <i>[Faint text]</i>		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 ***
12.				12a.			12b.
7/B. <i>[Faint text]</i>		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 ***
12.				12a.			12b.
7/B. <i>[Faint text]</i>		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 ***
12.				12a.			12b.
* 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 IS ISSUED BY							
Place				Date			
14 EXPORT ENDORSEMENT							
15 Bill of Lading / Air Waybill Number							
Block		Quantity					
A							
B							
C							
D							
Port of Export / Re-export				Date		Signature	
						Official stamp and title	



Original

Namprint: 2308

**MINISTRY OF ENVIRONMENT AND TOURISM**

Directorate Natural Resources Management  
Private Bag 13306  
Windhoek, Namibia  
Enquiries: Chief Warden,  
Permit Office



Tel: +264-61-284 2111  
Fax: +264-61-258 861

PERMIT No.:

175911

VALID FROM:

05/11/2017

VALID TO:

18/11/2017

RECEIPT No.:

02170806

**PERMIT TO HUNT FOR TROPHIES**

Permission is hereby granted in terms of the Nature Conservation Ordinance 1975 (Ord. 4 of 1975)

Name of Trophy Hunter:

Anthony (b) (6) Gaglia

Residential Address:

Country:

U.S.A

To hunt the specified number of game for the sake of trophies:

Indicates species listed on CITES  
Appendix I or II

SPECIES: COMMON NAME	Number
Buffalo	
Crocodile	
Dik-dik	
Eland	1x
Elephant	1x
Giraffe	1x
Grey Duiker	2x
Hippopotamus	
Impala, Black-faced	
Impala, common	
Klipspringer	
Kudu	2x
Lechwe	
Oryx (Gemsbok)	2x
Ostrich	1x
Red hartebeest	1x
Reedbuck	
Rhinoceros, black	
Rhinoceros, white	
Roan	1x
Sable	
Springbok	

SPECIES: COMMON NAME	Number
Steenbok	2x
Warthog	2x
Waterbuck	
Wildebeest, blue	2x
Zebra, Burchell's	
Zebra, Hartman's mountain	
Blesbok	
Wildebeest, black	
Cheetah	
Leopard	
Lion	
Other Kori Bustard	1x
* Please report back within 48 hours after being shot.	

on the following farms/hunting concessions:

Nyae - Nyae Conservancy

Guided by (name of guides):

S.M. Jacobs

**MINISTRY OF ENVIRONMENT & TOURISM**

Elvis Merkel E-Mkel.  
ISSUING OFFICER (NAME & SIGNATURE)

UNDER THE AUTHORITY OF THE MINISTER,  
POHAMBIA SHIFETA IN TERMS OF SECTION  
78 (L) OF THE NATURE CONSERVATION  
ORDINANCE, 1975 (ORDINANCE NO. 4  
OF 1975) AS AMENDED.

**Official MET date stamp**

MINISTRY OF ENVIRONMENT  
AND TOURISM  
REPUBLIC OF NAMIBIA

2017 -10- 3 0

WINDHOEK PERMIT OFFICE  
Private Bag 13306, Windhoek  
Tel: 2842111-Fax: 258861

IMPORTANT: This permit is not valid if altered in any way

1369

175 911

- \*L= Left, R=Right, Horn, B=Base, RW=Rowland Ward
- No trophy hunter may hunt unless accompanied by a professional hunter, master hunting guide or hunting guide.
- This permit must be kept on the person of the permit holder at all times while hunting.
- Only guide(s) as specified on the permit may conduct the hunt.



# Genus Logistics Inc.

16115 Rockaway Blvd STE 205 Jamaica NY 11434

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

Individual U.S. Customs Service Individual

IRS / SS #

(b) (6)

Partnership 141.32. C.R.

Sole Proprietorship

☒ Individual  
☐ Partnership  
☐ Corporation

## CUSTOMS POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS: That, Anthony Gaglio (Full Name of person, partnership, corporation, or sole proprietorship (Identify)) a corporation doing business under the laws of the State of, (b) (6) or a (b) (6) doing business as (b) (6) residing at (b) (6), Stamford CT (b) (6) having an office and place of business at (b) (6) hereby

constitutes and appoints each of the following persons Genus Logistics Inc.

may act through any of its offices 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 consigned 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, unloading 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, unloading, 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. In 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 power shall in no case have any force or effect after the expiration of 2 years from the date of its execution. Or until revoked. Pursuant to 19 CFR 111.36(a), election is made waiving the right to receive invoices, supporting documents and correspondences from Genus Logistics Inc., who is directed to forward all documents and inquiries concerning our imports to their customs brokerage services, to our freight forwarder, who will pay Genus Logistics Inc., 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) Anthony Gaglio  
has caused these presents to be sealed and signed:

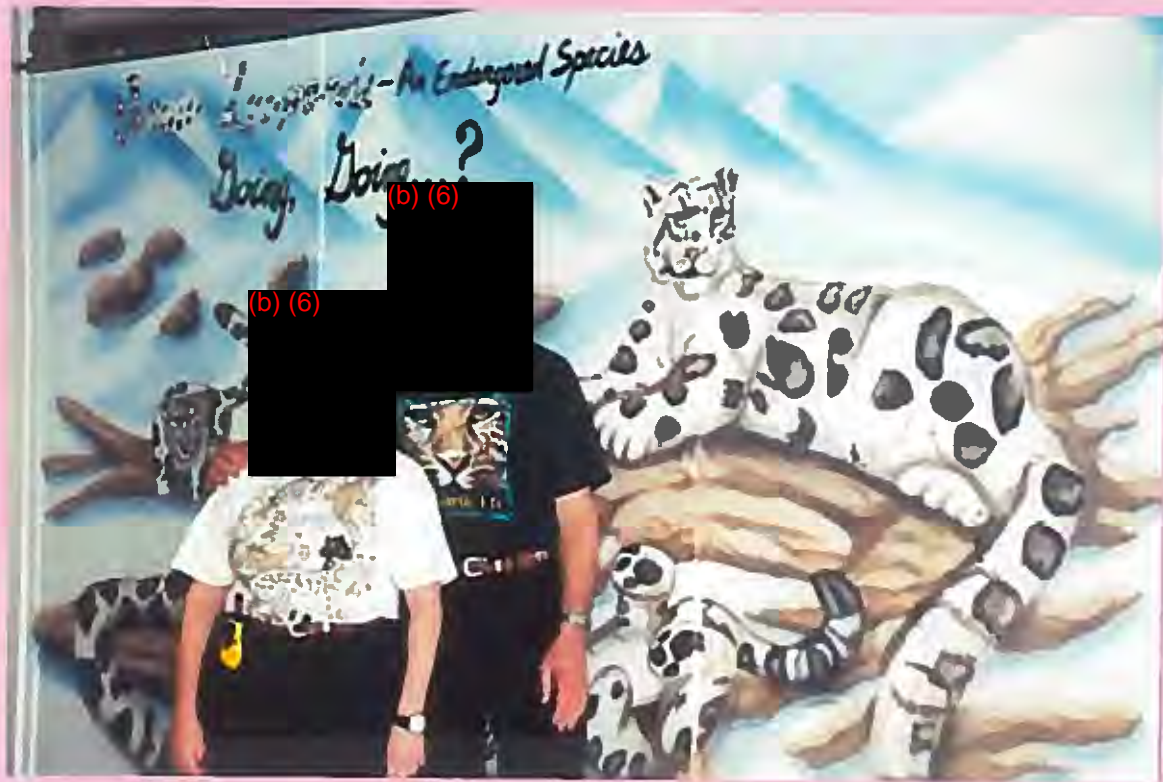
\*(Signature)

(Capacity)

\*(Date) 2/13/18

WITNESS







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

RCVD JUN 20 2018

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

Type of Activity

**IMPORT OF SPORT-HUNTED TROPHIES OF BONTEBOK  
TROPHIES FROM SOUTH AFRICA**

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 <b>Stein</b>	1.b. First Name <b>Michael</b>	1.c. Middle Name/Initial [REDACTED]	1.d. Suffix
2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
[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**

[REDACTED] or Room #: no P.O. Boxes)				
1.b. City <b>Francisco</b>	1.c. State <b>Indiana</b>	1.d. Zip code/Postal code [REDACTED]	1.e. County/Province	1.f. Country <b>USA</b>
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 <i>Title 50 Part 13 of the Code of Federal Regulations</i> and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)  <b>6-14-2018</b>

Please continue to next page

**IMPORT OF SPORT-HUNTED BONTÉBOK TROPHIES from South Africa**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** The bontébok is listed as endangered under the Endangered Species Act. Applications for endangered species permits must be published in the Federal Register for a 30-day public comment period. Allow at least 90 days for the application to be processed.

**Note 4:** This application can only be used if you have hunted/will be hunting in South Africa. If you have or will be hunting in a different country, please use form 3-200-20

**Note 5:** *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:
  - 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;
  - 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
  - The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

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)?

Michael Stein

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. How many Bontebok (*Damaliscus pygargus pygargus*) are you applying to import? Quantity: 1

- a. At the time of the application, the specimen(s) is:

Alive

☒ Dead

- b. What is the approximate date of proposed take? N/A

- c. What is the date you took the animal? 6/1/2018

- 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]:

10 Crichton Street, Korsten Port Elizabeth 6001 South Africa

5. ENTER the name and address of the landowner on whose property the bontebok was or will be taken:

Owners name: A.F. Van Niekerk  
Farm Name: Robertskraal  
District: Bedford  
Address: P.O. Box 171  
City: Bedford  
State/Province: South Africa  
Country, Postal Code: 5780

Please be aware that the bontebok is listed in Appendix II of CITES. As such, you must obtain a CITES export permit from South Africa. If you are not exporting the trophy from South Africa directly to the United States, you will need to obtain a CITES Re-export certificate from the re-exporting country.

6. Attach a signed statement from the landowner giving you permission to cull a bontebok from their captive herd.

Attached

7. If available, provide a copy of the landowner's Certification of Registration for the bontebok herd. (Note: this is not a copy of the export permit or certificate issued by a South African province.) In order to meet the criteria for a permit under the Endangered Species Act, the bontebok must be culled from a ranch that has been certified by the Government of South Africa under their bontebok program. If the ranch is not registered, we may be unable to issue an import permit.

Attached

8. **Complete name and address of overseas person or business shipping the trophy to you (this name will appear on the face of the permit).**

Name: Paul Smith  
Business Name: Relive Africa Taxidermy  
Address: 10 Crichton Street  
Address:  
City: Korsten  
State/Province: Port Elizabeth  
Country, Postal Code: 6001

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. **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).

Taxidermist/Broker's signature: \_\_\_\_\_ Date: \_\_\_\_\_

10. **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).

Applicant's signature:  Date: 6-14-2019

*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 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 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).

ROBVUE SAFARIS  
ROBERTSKRAAL  
P.O BOX 171  
BEDFORD  
5780  
EASTERN CAPE  
SOUTH AFRICA  
01 JUNE 2018

To whom it may concern

**RE: LANDOWNERS PERMISSION TO HUNT BONTEBOK (DAMALISCUS DORCAS DORCAS) ON HIS PROPERTY.**

With this letter I, Alfonso van Niekerk (landowner of the property Robertskraal, Farm no 281, Nxuba district Bedford), allow permission to hunt a Bontebok ram to the following hunter:

Michael Stein

Francisco

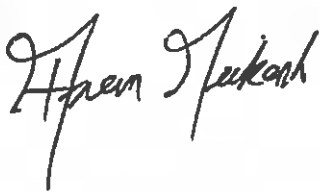
PASSPORT No: [REDACTED]

Permission is granted to hunt a Bontebok ram on the 01<sup>st</sup> June 2018.

Your cooperation in this regard is appreciated.

Yours truly,

A.F van Niekerk  
STANDING PERMIT NO: S 09557





Province of the  
**EASTERN CAPE**

DEPARTMENT OF ECONOMIC DEVELOPMENT  
AND ENVIRONMENTAL AFFAIRS

P/Bag X0054, BHISHO  
South Africa, 5605  
Phone: +27 (40) 609 4717  
Fax: +27 (40) 609 4700

Web: [www.deaet.ecprov.gov.za](http://www.deaet.ecprov.gov.za)

E-mail: [jaap.pienaar@deaet.ecape.gov.za](mailto:jaap.pienaar@deaet.ecape.gov.za)

Enquiries:	Jaap Pienaar	Reference #:	Bont Van Niekerk
E-mail:	<a href="mailto:jaap.pienaar@deaet.ecape.gov.za">jaap.pienaar@deaet.ecape.gov.za</a>	Date:	28 April 2009

Mr.A.F. van Niekerk  
P.O.Box 171  
Robertskraal  
Bedford  
5780

Dear Mr.van Niekerk

REGISTRATION OF BONTEBOK.

It is my pleasure to inform you that your Bontebok herd on the property Robertskraal, in the Bedford district has been registered as a pure herd. Congratulations!

The registration is done, based on the declaration received from you on the 1 May 2003 and the confirmation again on the 14<sup>th</sup> April 2009, which state, that since the introduction of this herd, no contamination by any Blesbuck, took place and that the Bontebok originates from a registered pure bred herd. The registration is done for the property Robertskraal, in the Bedford Magisterial district of the Eastern Cape.

This certification is extremely valuable and you should do everything possible to retain the purity of your herd. In future, export permits for sport-hunted bontebok trophies and permits to capture sell and transport bontebok, will only be issued in respect of registered herds.

Periodic re-inspections of registered herds will be carried out in future and it is in your own interest to ensure that no contamination of your valuable herd occurs. In the case of any possible contamination, this office must immediately be informed.

Once again, congratulations and thanks for your contribution towards Environmental Conservation.

A formal certificate will be send to you soon. In the meanwhile, this letter serves as the official proof of your registration.

Yours truly,

For: Chief Director Environmental Affairs; Eastern Cape



# ***Certificate of Registration***

## ***BONTEBOK HERD***



***It is hereby certified that the  
Bontebok herd on  
the property Robertskraal, of  
Mr.A.F. van Niekerk,  
in the Bedford District of the Eastern Cape,  
South Africa, is certified as pure on the  
1 May 2003***

***Presented to Mr.A.F. van Niekerk  
Date: 1 May 2003***

***For; Chief Director: Environmental Affairs***

***Issued by: Department of Economic Development and Environmental Affairs  
Province of the Eastern Cape***







RCVD JUN 20 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 OF SOUTHERN  
AFRICAN LEOPARD AND NAMIBIAN SOUTHERN WHITE  
RHINOCEROS**

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 Whitworth	1.b. First Name Jared	1.c. Middle Name/Initial (b) (6)	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) (b) (6)	3. Telephone Number (b) (6)	3.a. Alternate Telephone Number (b) (6)	3.b. E-mail Address (b) (6)

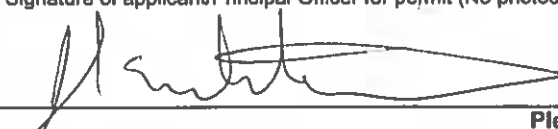
**Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution**

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 Hardinsburg	1.c. State KY	1.d. Zip code/Postal code (b) (6)	1.e. County/Province	1.f. Country U.S.A.
2.a. Mailing address (include if different than physical address; include name of contact person) (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)  06/11/2018	
Please continue to next page	

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND NAMIBIAN SOUTHERN WHITE RHINOCEROS** *And South African Elephant.*

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** *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 4:** Certain hunting trophies, including leopard 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.

- Complete all questions on the application.
- Mark questions that are not applicable with "N/A".
- If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.
- 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. A self-addressed envelope is enclosed.*

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

*Jared 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

- a. ~~Leopard (*Panthera pardus*)~~ <sup>Elephant (*Loxodonta Africana*)</sup> Quantity: 1 (limited to the import of two per calendar year). If you wish to import a ~~leopard~~ <sup>elephant</sup> taken in ~~northern or western~~ <sup>South</sup> Africa, please use form 3-200-20.
- b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia  
Quantity: \_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).

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 ANIMAL HAS ALREADY BEEN TAKEN, please enter the following:**

- d. 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 Reserve  
Hoedspruit

- e. Date wildlife was hunted: May 26<sup>th</sup> 2018 to June 07<sup>th</sup> 2018

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

Graham Sales Safaris

- g. 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]:

Life-Form Taxidermy  
No 7 Aluminum Road / PO Box 763  
White River  
Mpumalanga 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).

Please see Attached.

8. Complete name and address of overseas person or business shipping the trophy to you.

- a. 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

Address:

City: White River

State/Province: Mpumalanga

Country, Postal Code: South Africa 1240

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. 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.

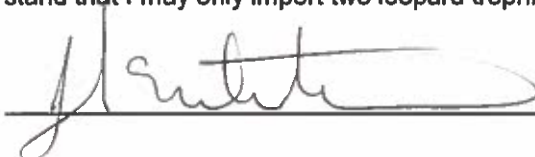
Taxidermist/Broker's signature: \_\_\_\_\_ Date: \_\_\_\_\_



10. 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: 06/11/2018

*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.*

11. 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).



*Integrated*  
**ORDINARY PERMIT**  
*LEIMA Act of 2003*

(Issued in terms of the provisions of the  
National Environmental Management:  
Biodiversity Act 2004, Act 10 of 2004)

DEPARTMENT OF ENVIRONMENT & TOURISM  
POLOKWANE PERMIT OFFICE  
CAPRICORN DISTRICT  
PERMIT NUMBER: O No. 1686  
2017-10-23

NAME	PRIVATE BAG X 9565
ADDRESS	POLOKWANE 0700
PROVINCE	LIMPOPO PROVINCE

DETAILS OF PERMIT HOLDER	
NAME	Cecil Cunningham
SURNAME	Cecil Cunningham
POSTAL ADDRESS	POLOKWANE PERMIT OFFICE CAPRICORN DISTRICT 2017-10-23
RESIDENTIAL ADDRESS	7 Aluminium Road White River 1240
TOWN	White River
POSTAL CODE	1240
PROVINCE	PRIVATE BAG X 9565 Mpumalanga

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT	
NAME AND SURNAME OF APPLICANT	Cecil Cunningham
NAME AND SURNAME: RESPONSIBLE PERSON	Cecil Cunningham
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	Life Farm Taxidermy
PHYSICAL ADDRESS OF FACILITY	White River 1240
DISTRICT	
PROVINCE	
REGISTERED NAME AND NUMBER (in the case of game farm)	

(630)

DETAILS OF SPECIES INVOLVED				
SPECIES		SEX	QUANTITY	MARKING
COMMON NAME	SCIENTIFIC NAME	(if known)		(if applicable)
Hunting trophies listed in terms of TOPS & LEIMA.				

DETAILS OF RESTRICTED ACTIVITIES INVOLVED	
Import & convey hunting trophies from other provinces to a taxidermy. Sell legally obtained hunting trophies convey & export from other provinces to shipping agencies in other provinces.	

NAME AND SURNAME OF PURCHASER/SELLER	
RESIDENTIAL ADDRESS OF PURCHASER/SELLER	

IN THE CASE OF INTERNATIONAL IMPORT/EXPORT:	
NAME AND SURNAME OF CONSIGNEE/CONSIGNOR	POLOKWANE PERMIT OFFICE
RESIDENTIAL ADDRESS OF CONSIGNEE/CONSIGNOR	CAPRICORN DISTRICT 2017-10-23

IN THE CASE OF A HUNT:	
NAME AND SURNAME OF HUNTING CLIENT (if applicable)	PRIVATE BAG X 9565
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	POLOKWANE 0700
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	LIMPOPO PROVINCE
WEAPON AND METHOD OF HUNTING	

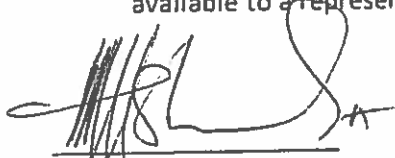
IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:	
WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION		
PERIOD OF VALIDITY	FROM: 23/10/2017	TO: 22/10/2018
RECEIPT NUMBER	1096346 (R100-06)	
SIGNATURE OF ISSUING OFFICER:	SIGNATURE OF PERMIT HOLDER:	
DATE STAMP:		

## TO OPERATE AS A WILDLIFE TRADER – TAXIDERMIST.

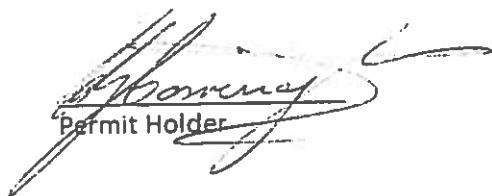
### **SPECIAL CONDITIONS UNDER WHICH PERMIT NO: 4683**

1. No animals, trophies or derivatives may be received without written proof of legal acquisition.
2. This permit authorizes the collection of legally hunted trophies nationally.
3. This permit authorizes the conveyance of processed or unprocessed trophies to other Taxidermist or shipment agents excluding rhino horn and elephant tusks.
4. This permit authorizes the holder of the permit to be in possession of trophies or derivatives during the processing process.
5. This permit authorizes the holder to trade trophies, parts and/or derivatives excluding elephant ivory and rhino horn.
6. The holder of this permit must keep a register which inter alia include the following:
  - Full name and contact details of person who handed in trophy,
  - The date received;
  - The specie and sex of animal,
  - Quantity,
  - Permit number.
7. The name of the owner, destination of trophy and date collected, must be indicated for all collected items.
8. As from April, all shipments to other countries must be inspected by a representative from the Department. All CITES export permits must be endorsed and crates sealed with a Departmental seal before leaving the Province. NB to be left out
9. This permit and register must be kept updated and on the premises and must be available to a representative of this Department for inspection purposes.

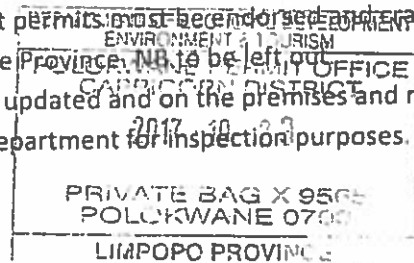


Permit Officer

Date



Permit Holder



26/10/2017

Date

DEPARTMENT OF AGRICULTURE



**Результаты**  
**исследования**

ОКРЕН 72/0009/2019

DEPT. LANDSCAPE

LITRO LETERULIMA



VETERINARY PERMIT TO MOVE ANIMALS / ANIMAL PRODUCTS  
VEEARTSENTERMIT VIR VERVOER VAN DIERE / DIEREPRODUKTE  
INVULGO YEKUHAMBIRA TILWANE / TINTFO LETHABULISANO TETILWANE

In terms of the Animal Diseases Act No. 35 of 1924 permission is hereby granted to: Kragens die Wet op Dieriesiektes Nr. 35 van 1924 word toestaan om kennis te doen aan: Ngadigunya khatsofo waTlo leTswana No. 35 wa 1924:

Name:	Zweliwe Mgwanya					ID No:	8502165547085									
Address:	Life form Academy White River															
to move with	on to be used most		Inventory		SPECIES		LIVE PRODUCT									
Identified as follows:	S. Hean (16)		Elephant		Troph. 2											
Isolation/size ngs:	TUSKS x2, 4 feet, Poneb, Head, 2 ears & Trunk															
from the farm/district area/place	Vans die place/district/area/place		Lusaka epusazini/district/area/place		STOCK CARD NUMBER		in the district of		in the district of		in the district of					
to the farm/district area/place	na die place/district/area/place		Life form		White River		Bobasela		Elanzeneni							
On the following conditions:																


On the following constants

1. This permit:
  - (a) is valid for 90 days from date of issue and for each consecutive entry
  - (b) must accompany the animals / products mentioned above;
  - (c) must be produced for inspection on demand by any kind of animal owner or police or veterinary official;
  - (d) must be kept at a destination until ordered by a veterinary official.
2. For grass / green products a pesto conservation permit is also needed.
3. Animals and products must be visibly free from external parasites.
4. Animals are to be transported in accordance with animal welfare guidelines.
5. Other conditions:

- Op die volgende voorbeelde:
1. Keerde punt:  
(a) is geëindig vir 10 dae was (daar was  
afsluiting en daar is een bevestiging)
  - (b) moet die dae / produkte hierin verander  
word.
  - (c) moet vir bepaalde gelede word op  
aanvang van elke gelede of afsluiting  
of polke- of verskuiwingspunt.
  - (d) moet by bevestiging gelede word toegevoeg  
of daar is verskuiwingspunt gelede word.
2. Vir wêreld / wêreldwye word 'n verskuiwingspunt toegevoeg.
1. Daar is produkte moet bygevoeg word van  
afsluiting punt toe.
  2. Daar moet volgens afsluiting-punt verander word.
3. By die verskuiwingspunt

1. Explain the following terms in brief:
  - (1) Lawrence
  - (2) Lawrence was a young 19 years old  
and he was a very good person  
and he was a very good person
  - (3) Lawrence was a very good person  
and he was a very good person
  - (4) Lawrence was a very good person  
and he was a very good person
  - (5) Lawrence was a very good person  
and he was a very good person
2. Explain the following terms in brief:
  - (1) Lawrence was a very good person  
and he was a very good person
  - (2) Lawrence was a very good person  
and he was a very good person
  - (3) Lawrence was a very good person  
and he was a very good person
  - (4) Lawrence was a very good person  
and he was a very good person
  - (5) Lawrence was a very good person  
and he was a very good person

Transported in LEAKAGE PROOF Containers directly to the  
G. Refueling for / Containing for / Direct slaughter station at Life form Tardigrade white bus

Seal no/s		Days after arrival at destination	Where does
Vehicle reg. no/s	HCD 922MP	From / Pick / Interim	Control gate
		Date / Depart / Depart	01/06/2018
I hereby certify that all applicable control documents for loading of this goods have been completed and			
 Maheshwari D. V. Issuing Veterinary Officer		SIGNATURE	
IMPORTANT NOTE / BELANGRIJKE NOTIE / CATO / IMPORTANTE NOTIZIONE			

[illegible]

Chief Directorate: Veterinary Services  
2018-03-01  
State Veterinary Officer  
Klaserie w.o.  
PROVINCE OF

0009  
DATE STAMP  
2010-06-01  
State Veterinary Officer: Ope  
Khashe Ward  
PROVINCE OF MPUMA







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

OMB No. 1018-0164  
Expires 11/30/2016

**Federal Fish and Wildlife Permit Application Form**

**JUN 22 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 of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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.

<b>A. Complete if applying as an individual</b>			
1.a. Last name WASIF (b) (6) LATEEF	1.b. First name WASIF (b) (6) LATEEF	1.c. Middle name or initial	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Occupation (b) (6)	4. Affiliation/ Doing business as (see instructions)	
5.a. Telephone number (b) (6)	5.b. Alternate telephone number (b) (6)	5.c. Fax number	5.d. E-mail address (b) (6)

<b>B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution</b>			
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

<b>C. All applicants complete address information</b>					
1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)					
1.b. City Westlake Village	1.c. State CA	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	

<b>D. All applicants MUST complete</b>	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – <i>attach documentation of fee exempt status as outlined in instructions.</i> (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in <i>Title 50, Part 13 of the Code of Federal Regulations</i> and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature of applicant/person responsible for permit (No photocopied or stamped signatures) <i>W. Hoffmann</i> Date of signature (mm/dd/yyyy) 05/30/2018	

Please continue to next page

1391

## E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: N/A (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: 1 (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: N/A (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: **Lupane, Zimbabwe**

- b. Date wildlife was hunted: **03/22/2018**

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

1.Processed goods made out of my Elephant skin(Finished products like Belts, Carry case,Tail, Feet)  
2.Ivory

- 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]:

**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 appear on the face of the export permit].

Name: Business      Trophy Consultants International (T.C.I.)(Formerly - Taxidermy Enterprises (Pvt) Ltd).  
Name: Address:  
Address:              4 Josiah Chinamano Road,  
City:                   Belmont,  
City:                   Bulawayo,  
State/Province:      ZIMBABWE  
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: Wazirullah Date: 06/12/2018

*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.*

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 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):

Ashar (b) (6) Lateef  
(b) (6) Westlake Village, CA (b) (6) USA.

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):

Ashar (b) (6) Lateef,  
(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.





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

Federal Fish and Wildlife Permit Application Form

JUN 22 2018

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 BONTEBOK TROPHIES FROM SOUTH AFRICA

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 <b>Cabela</b>	1.b. First name <b>Rich</b>	1.c. Middle name or initial <b>(b) (6)</b>	1.d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Social Security No. <b>(b) (6)</b>	4. Occupation <b>(b) (6)</b>	5. Affiliation/ Doing business as (see instructions)
6.a. Telephone number <b>(b) (6)</b>	6.b. Alternate telephone number <b>none</b>	6.c. Fax number <b>—</b>	6.d. E-mail address <b>(b) (6)</b>

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>(b) (6)</b>					
1.b. City <b>Sidney</b>	1.c. State <b>NE</b>	1.d. Zip code/Postal code: <b>(b) (6)</b>	1.e. County/Province <b>(b) (6)</b>	1.f. Country <b>USA</b>	
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)					
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country	

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <b>(b) (6)</b> Signature (in _____) of applicant/person responsible for permit (No photocopied or stamped signatures) <b>(b) (6)</b> Date of signature (mm/dd/yyyy) <b>06/13/08</b>	



## E. IMPORT OF SPORT-HUNTED BONTBOK TROPHIES from South Africa

**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 were 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:** The bontebok is listed as endangered under the Endangered Species Act. Applications for endangered species permits must be published in the Federal Register for a 30-day public comment period. Allow at least **90 days** for the application to be processed.

**Note 3:** This application can only be used if you have hunted/will be hunting in **South Africa**. If you have or will be hunting in a different country, please use form 3-200-20:  
<http://www.fws.gov/international/permits/by-form-number/index.html>

**Note 4:** USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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.

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 submit, indicate the application question number you are addressing. If applying for more than one trophy, be sure to indicate which trophy is addressed in each response.

1. How many Bontebok (*Damaliscus pygargus pygargus*) are you applying to import? Quantity: 1

2. At the time of the application, if bontebok is:

Alive, a. What is the approximate date of proposed take? October 20-25 2018

Dead, b. What is the **date** you took the animal? \_\_\_\_\_

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]:

3. ENTER the name and address of the **landowner** on whose property the bontebok was or will be taken:

Name: Mr. J. J. Pretorius  
Business Name: Spring Valley  
Address:  
Address:  
City: Tarkastad district  
State/Province: Eastern Cape  
Country, Postal Code: South Africa

*Please be aware that the bontebok is listed in Appendix II of CITES. As such, you must obtain a CITES export permit from South Africa. If you are not exporting the trophy from South Africa directly to the United States, you will need to obtain a CITES Re-export certificate from the re-exporting country.*

4. a. Attach a signed statement from the **landowner** giving you permission to cull a bontebok from their captive herd.
- b. If available, provide a copy of the landowner's Certification of Registration for the bontebok herd. (Note: this is **not** a copy of the export permit or certificate issued by a South African province.) In order to meet the criteria for a permit under the Endangered Species Act, the bontebok must be culled from a ranch that has been certified by the Government of South Africa under their bontebok program. If the ranch is not registered, we may be unable to issue an import permit.
5. **Complete name and address** of overseas person or business shipping the trophy to you (this name will appear on the face of the permit).

Name: *Sean Kelly*  
Business Name: *Garry Kelly Safaris*  
Address: *Beverly Lodge*  
Address: *Dargle*  
City: *Dargle KZN 3265*  
State/Province:  
Country, Postal Code: *South Africa*

**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(ies) 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**).

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(ies) 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**).

Applicant's signature:  \_\_\_\_\_ Date: *6-13-18*

*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 state 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): *Rich Cabada* [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.



Province of the  
**EASTERN CAPE**  
DEPARTMENT OF ECONOMIC AFFAIRS  
ENVIRONMENT AND TOURISM

P/Bag X0054, BHISHO  
South Africa, 5605  
Phone: +27 (43) 6057086  
Fax: +27 (43) 6057300  
Web: [www.deaet.ecprov.gov.za](http://www.deaet.ecprov.gov.za)  
E-mail: [zoleka.dubula@deaet.ecape.gov.za](mailto:zoleka.dubula@deaet.ecape.gov.za)

NO: HC 19 / 2017 EC

PROVINCIAL ADMINISTRATION OF THE EASTERN CAPE

DEPARTMENT OF ENVIRONMENTAL AFFAIRS

**PERMIT TO ACT AS A HUNTING CONTRACTOR**

Environmental Conservation Ordinance 19 of 1974 (section 72B)

NOT TRANSFERABLE

In terms of section 72B of the Environmental Conservation Ordinance, 1974 (Ordinance 19 of 1974)

A permit is hereby issued to:

A.R. KING
P. O. BOX 174
TARKASTAD
5370

To act as a hunting contractor: - (BRAESIDE FARM-CHRIS HANI)

**CONDITIONS AND LIMITATIONS**

1. This permit takes effect when the signature of the holder thereof has been endorsed thereon in ink.
2. This permit is valid from 16 / 02 / 2017 TO / 02 / 2020

*ABM*

Chief Director of Environmental Affairs

16 / 02 / 2017

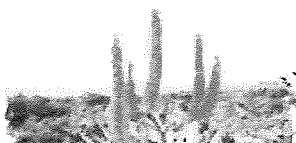
Date

Permit holder

BIODIVERSITY & CONSERVATION  
DEPARTMENT OF ECONOMIC DEVELOPMENT  
ENVIRONMENTAL AFFAIRS AND TOURISM

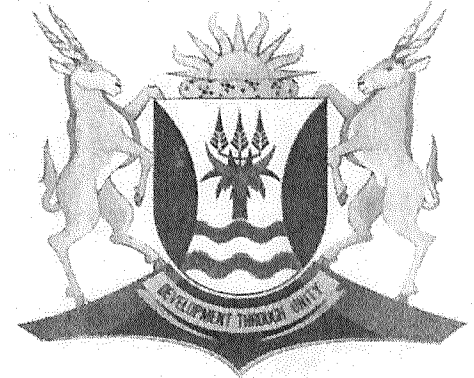
2017 -02- 15

P/BAG X0054 INGXOWA EYODWA X0054  
PRIVAATSAK X0054  
EKONOMIESE ONTWIKKELING  
DIE PROVINSIE OOS-KAAP BHISHO



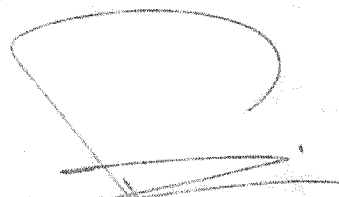
# ***Certificate of Registration***

## ***BONTEBOK HERD***



***It is hereby certified that the  
Bontebok herd on  
the property Spring Valley, of  
Mr.J.J.Pretorius  
in the Tarkastad district of the Eastern Cape,  
South Africa, is certified as pure on the  
29 February 2012***

***Presented to Mr.J.J.Pretorius  
Date: 29 February 2012***

  
***For, General Manager: Environmental Affairs***

**Issued by: Department of Economic Affairs, Environment and Tourism  
Province of the Eastern Cape**







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

Type of Activity

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 <b>PHILLIPS</b>	1.b. First Name <b>WALLACE</b>	1.c. Middle Name/Initial <b>(b) (6)</b>	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number <b>(b) (6)</b>	3.a. Alternate Telephone Number	4. E-mail address <b>lilley@well-usa.com</b>

**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>(b) (6)</b>				
1.b. City <b>COLLEGE STATION</b>	1.c. State <b>TX</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>
2.a. Mailing address (include if different than physical address; include name of contact person if applicable) <b>WELL WORLDWIDE ENERGY LOGISTICS, ATTN: LYNETTE LILLEY, 17401 ALDINE WESTFIELD RD.</b>				
2.b. City <b>HOUSTON</b>	2.c. State <b>TX</b>	2.d. Zip code/Postal code <b>77073</b>	2.e. County/Province <b>(b) (6)</b>	2.f. Country <b>USA</b>

**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 <i>Title 50 Part 13 of the Code of Federal Regulations</i> and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.
<b>06/01/2018</b>	
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)	
<b>Please continue to next page</b>	

**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 ENVELOP ATTACHED

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

LYNETTE LILLEY  
281-606-2400  
EMAIL: [llilley@well-usa.com](mailto:llilley@well-usa.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.

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:

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:

NAMIBIA: EISEB CONSERVANCY

b. Date wildlife was hunted:

JUNE 25, 2017

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

JJN WASSERFALL  
P.O. BOX 1677  
WINDHOEK, NAMIBIA

- 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]:

REISER TAXIDERM  
BRAKWATER  
WINDHOEK, NAMIBIA

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.N. BLAAUW  
Business Name: P.O. BOX 11908  
Address: WINDHOEK NAMIBIA  
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?

NONE

- 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?

THEY WERE USED FOR CONSERVATION

- 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: \_\_\_\_\_

*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).





CONVENTION ON  
INTERNATIONAL TRADE IN  
ENDANGERED SPECIES OF  
WILD FAUNA AND FLORA

PERMIT / CERTIFICATE No.

☒ EXPORT

☐ RE-EXPORT

☐ IMPORT

☐ OTHER:

055417

Original

2 Valid until

5/08/2018

3 Importer (name and address)

Wallace Phillips

(b) (6)

College Station

(b) (6)

3a. Country of Import

USA

5. Special conditions

Not valid if not certified by the Namibian customs  
Tusks nos: NA 17 0023 8 10 & NA 17 0024 7 85

All imports and exports remain subject to veterinary regulations  
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

4 Exporter / Re-exporter (name, address and country)

J. N. Blaauw

P O BOX 11903

Windhoek

Namibia

Signature of the applicant

6. Name, address, national seal/ stamp and country of Management Authority



MINISTRY OF ENVIRONMENT AND  
TOURISM

Directorate Scientific Services  
Private Bag 13306  
Windhoek  
NAMIBIA

5a. Purpose of the transaction (see reverse)

5b. Security stamp No.

1555057

7/B. 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

7/B. *Loxodonta africana*  
African elephant

9. 2x Tusks

10. II W

11. 2 item

11a. 5/90  
(2015)

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 \*\*\*

7/B. *Loxodonta africana*  
B African elephant

9. jaw 2x skin panels 2  
ears 4x feet & skull

10. II W

11. 18 item

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 \*\*\*

7/B. C

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 \*\*\*

7/B. D

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 IS ISSUED BY:

J. Shapi

Windhoek

Place

15/02/2018

Date

MINISTRY OF ENVIRONMENT  
AND TOURISM  
REPUBLIC OF NAMIBIA

15 FEB 2018



Windhoek  
Tel: 2842823 • Fax: 258861

Security stamp, signature and official seal

14. EXPORT ENDORSEMENT

15. Bill of Lading / Air Waybill Number

Block	Quantity
A	
B	
C	
D	

Port of Export / Re-export

Date

Signature

Official stamp and title

Original

Namprint 2308



**MINISTRY OF ENVIRONMENT AND TOURISM**

Directorate Scientific Services

Private Bag 13305

Windhoek, Namibia

Enquines, Chief Warden

Permit Office



Tel +264-61-284 2111

Fax +264-61-258 861

PERMIT No.:

172250

VALID FROM:

16.06.17

VALID TO:

2.06.17

**PERMIT TO HUNT FOR TROPHIES**

Permission is hereby granted in terms of the Nature Conservation Ordinance 1975 (Ord. 4 of 1975)

Name of Trophy Hunter:

W. (b) (6) Phillips (b) (6)

Residential Address:

Country:

USA

to hunt the specified number of game for the sake of trophies



Indicates species listed on CITES Appendix I or II

	SPECIES: COMMON NAME	Number
	Buffalo	/
Sps I	Crocodile	/
	Dik-dik	/
	Eland	1x
Sps II	Elephant	1x
	Giraffe	/
	Grey Duiker	2x
Sps II	Hippopotamus	/
	Impala, Black-faced	/
	Impala, common	/
	Klipspringer	/
	Kudu	1x
Sps II	Lechwe	/
	Oryx (Gemsbok)	/
	Ostrich	/
	Red hartebeest	/
	Reedbuck	/
Sps I	Rhinoceros, black	/
Sps I	Rhinoceros, white	/
	Roan	/
	Sable	/
	Springbok	/

	SPECIES: COMMON NAME	Number
	Steenbok	2
	Warthog	2x
	Waterbuck	/
	Wildebeest, blue	/
	Zebra, Burchell's	/
Sps II	Zebra, Hartman's mountain	/
	Blesbok	/
	Wildebeest, black	/
Sps I	Cheetah	/
Sps I	Leopard	/
Sps II	Lion	/
	Other	/
	Please report back with trophies after starting	
		/
		/
		/
		/
		/
		/
		/
		/
		/

on the following farms / hunting concessions:

Fisch Conservancy

Guided by (name of guides):

J. J. M. Wasserfall

Cashier receipt No.:

241029

Issued on:

16.06.17 16.06.17

Amount received:

 MINISTRY OF ENVIRONMENT & TOURISM  
 Issued by: Nicholas R. Breda  
 ISSUING OFFICER (NAME & SIGNATURE)

 UNDER THE AUTHORITY OF THE MINISTER  
 IN TERMS OF SECTION 28(1) OF THE NATURE CONSERVATION ACT  
 OF 1975 (AS AMENDED).  
 IMPORTANT: This permit is not valid if altered in any way.

Official MET date stamp

The following certificate must be completed immediately after each animal that has been hunted (please print)

[illegible]

<sup>a</sup>L=Left, R=Right, H=Horn, B=Base, RW=Rowland Ward

No trophy hunter may hunt unless accompanied by a professional hunter, master hunting guide or hunting guide. This permit must be kept on the person. Failure to comply is a Class A misdemeanor.

This permit must be kept on the person of the permit-holder at all times while hunting.

Only guide(s) as specified on the permit may conduct the hunt.

U.S. CUSTOMS POWER OF ATTORNEY  
for a  
U.S. RESIDENT IMPORTER & EXPORTER

Department of Homeland Security  
US Customs and Border Protection  
19 CFR 141.32

Phone# (b) (6)

Cell Phone# (b) (6)

Em (b) (6)

Check appropriate box(es)

- ☒ An Individual  
☐ A Sole Proprietorship  
☐ A Partnership  
☐ A Corporation  
☐ A Limited Liability Company



SS# (b) (6)

KNOW ALL MEN BY THESE PRESENTS: That (b) (6) (b) (6) (b) (6)

doing business as (b) (6) under the laws of the State of (b) (6) (b) (6)

home address (b) (6) College Station, TX (b) (6)

hereby constitutes and appoints (b) (6) as its agent, attorney-in-fact, and representative, to act through its officers, employees and

As a true and lawful agent and attorney of the Grantor named above for and in the name, place and 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 such merchandise; to receive any merchandise deliverable to said Grantor;

To make endorsements on bills of lading conferring authority to transfer title; to make entry and collect drawback; and to make, sign, declare, or swear to any statement, supplemental statement, schedule, supplemental schedule, certificate of delivery, certificate of manufacture, certificate of manufacture 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 other 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 exported with or without benefit of drawback or in connection with the entry, clearance, lading, unloading or navigation of any vessel or other means of conveyance owned or operated by said Grantor, and any and all bonds of which may be voluntarily given, and accepted under applicable laws and regulations, consignee's and owner's declaration provided for in section 485 Tariff Act of 1930 amended or affidavits in connection with the entry or 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, unloading, or operation of any vessel or other means of conveyance owned or operated by Grantor;

To grant powers of attorney on behalf of said Grantor to other Customs Brokers to act as said Grantor's agent; to receive, endorse and collect checks issued for Customs duty refunds in said Grantor's name drawn on the Treasurer of the United States;

And generally to transact all the customs business, including making, sign section 514 of the Tariff Act of 1930, in connection or interested and which performed by an agent and attorney of power and authority to do anything what done in the premises as fully as said acting, hereby ratifying and confirming the same, the foregoing power of attorney shall remain in full force and effect until

(b) (6) Revoked

If Grantor is a partnership or LLC, signatory certifies that before has full authority to execute this instrument on behalf of Grantor and shall state the names of all members and/or directors on a separate addendum to this document, and said the power shall in no case have any force or effect beyond two years from the date of its execution.

Grantor further authorizes Grantor to act as its agent in signing or endorsing export documents, i.e. commercial invoices, shipper's export declarations, Automated Export System records, bills of lading, insurance certificates, drafts and any other documents necessary to the successful completion of any export transaction on its behalf.

If Grantor is a U.S. Principal Party in Interest (USPPI) in an export transaction then the Grantor/USPPI hereby certifies that all statements and information contained in the documentation provided to Grantor relating to exportation are true and correct. Furthermore, Grantor/USPPI understands that civil and criminal penalties may be imposed for making false or fraudulent statements or for the violation of any United States laws or regulation on exportation. Grantor/USPPI undertakes to determine any export license requirements and to obtain, for export purposes, any export license or other official authorization.

All services and transactions are subject to WELL's Terms and Conditions of Service (NCBFA 80M) which are included in this document for which Grantor expressly acknowledges receiving a written copy. To the extent provided by law, WELL's liability as a Customs Broker is limited to \$50.00 (19 USC 1647(f)).

IN WITNESS WHEREOF, the said Grantor has caused these presents to be signed and signed:

(signature) X Wallace Phillips

(capacity) (b) (6)

(print name) (b) X Wallace Phillips (b) (6)

(date) (b) (6)

If you are the importer of record, payment to the broker will not relieve you of liability for Customs charges (duties, taxes, or other debts owed Customs) in the event the charges are not paid by the broker. Therefore, if you pay by check, Customs charges may be paid with a separate check payable to the "Bureau of Customs and Border Protection" which shall be delivered to Customs by the broker (19 CFR 111.20). If you elect to make payment with a check made payable to the Bureau of Customs and Border Protection, arrangement must be made in advance.

VOID JUN 22 2018

WELL WORLDWIDE ENERGY LOGISTICS INC.  
17401 ALDINE WESTFIELD RD  
HOUSTON, TX 77073-5001  
T 281-606-2400

(b) (4)

(b) (4)

06/01/2018

PAY TO THE ORDER OF US FISH & WILDLIFE SERVICE

\$ 100.00

One hundred -----  
US FISH & WILDLIFE SERVICE

00/100 DOLLARS

MEMO

*[Handwritten Signature]*

AUTHORIZED SIGNATURE



(b) (4)



**IMPORT OF SPORT-HUNTED BONTBOK TROPHIES from South Africa**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** The bontbok is listed as endangered under the Endangered Species Act. Applications for endangered species permits must be published in the Federal Register for a 30-day public comment period. Allow at least 90 days for the application to be processed.

**Note 4:** This application can only be used if you have hunted/will be hunting in South Africa. If you have or will be hunting in a different country, please use form 3-200-20

**Note 5:** *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:
  - 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;
  - 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
  - The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

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 ATTACHED

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?  
LYNETTE LILLEY, 281-606-2400  
EMAIL: llilley@well-usa.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. How many Bontebok (*Damaliscus pygargus pygargus*) are you applying to import? Quantity: 1

- a. At the time of the application, the specimen(s) is:

Alive      Dead

- b. What is the approximate date of proposed take? \_\_\_\_\_

- c. What is the date you took the animal? MAY 14, 2017

- 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]:  
HOLDING 34, 5TH AVENUE, BREDELL, 1623, GAUTENG, SOUTH AFRICA

5. ENTER the name and address of the landowner on whose property the bontebok was or will be taken:

Owners name: OTTERSKLOOF SAFARIS  
Farm Name: OTTERSKLOOF SAFARIS  
District: FREE STATE  
Address: P.O. BOX 44  
City: PHILIPPOLIS  
State/Province: FREE STATE  
Country, Postal Code: SOUTH AFRICA 9970

Please be aware that the bontebok is listed in Appendix II of CITES. As such, you must obtain a CITES export permit from South Africa. If you are not exporting the trophy from South Africa directly to the United States, you will need to obtain a CITES Re-export certificate from the re-exporting country.

6. Attach a signed statement from the landowner giving you permission to cull a bontebok from their captive herd.
7. If available, provide a copy of the landowner's Certification of Registration for the bontebok herd. (Note: this is not a copy of the export permit or certificate issued by a South African province.) In order to meet the criteria for a permit under the Endangered Species Act, the bontebok must be culled from a ranch that has been certified by the Government of South Africa under their bontebok program. If the ranch is not registered, we may be unable to issue an import permit.

8. **Complete name and address** of overseas person or business shipping the trophy to you (this name will appear on the face of the permit).

Name: NICOLENE LENTON  
Business Name: SAFARI CARGO SYSTEMS  
Address: HOLDING 34  
Address: 5TH AVENUE  
City: BRENDILL  
State/Province: GAUTENG  
Country, Postal Code: SOUTH AFRICA, 1623

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. **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**).

Taxidermist/Broker's signature: *Remette Leiby* Date: *06/08/2018*

*WELL Worldwide, Any In fact*

10. **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**).

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 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).



## PERMISSION TO HUNT

LAND OWNER:

Name:	A.H. Erasmus		
Residential Address:	OTTERSKLOOF PRIVATE GAME RESERVE		
	P.O. BOX 41 PHILIPPOLIS		
	9970	Tel. No.:	074 171 8603
Farm (Reg. Name) No.:	Otterskloof P G R	Hectare s:	13 000ha
District:	Philippolis		


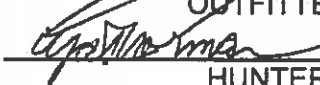
HUNTER:

Name:	Wyatt [REDACTED] Norman		
ID Number:			
Residential Address:	[REDACTED] Corpus Christi TX [REDACTED]		
Tel. No.:	[REDACTED]		

GAME SPECIES

No.:	SPECIES:	QUANTITY	NOTES
1. ✓	Rean	1	Cape, Skull, Back skin
2. ✓	Lechwe	1	Cape, Skull, Back skin
3. ✓	Bontebok	1	Cape, Skull, Back skin
4. ✓	Mountain Reedbuck	1	Cape, Skull, Back skin
5. ✓			
6.			
7.			
8.			
9.			
10.			

VALIDITY OF PERMISSION:	FROM : 03/05/2017	TO: 07/05/2017
PERMIT No.:	1007/29065	LISENCE No.: 09947

  
 \_\_\_\_\_  
 OUTFITTER  
  
 \_\_\_\_\_  
 HUNTER

11/05/2017  
 \_\_\_\_\_  
 DATE  
 11/05/2017  
 \_\_\_\_\_  
 DATE



**destea**  
department of  
economic, small business development,  
tourism and environmental affairs  
FREE STATE PROVINCE

Enquiries: Ref: Bontebok export

Enq: C. Erasmus

To the CITES Authority

USA

Country of Import

To whom it may concern

**Re: No objection to the import of Bontebok from the Free State Province**

The Free State permit office hereby states that the bontebok to be exported to your country from Otterskloof Private Game Reserve were tested and declared as pure herds. After the confirmation of the approval of the positive genetic status, the reserve has declared that they have taken strict measures to prevent any contamination by separating their bontebok population into separate camps.

Any further correspondences may be directed to the writer.

Yours sincerely

  
C. Erasmus

Director: Biodiversity Management

Date 14/11/2017

Office of the Director: Biodiversity Management & Conservation  
Private Bag X 20801  
Bloemfontein  
9302  
113 St Andrews str  
St Andrews Building  
Room 202  
Bloemfontein, 9300

Tel +27 (0)51 400 4798 / 4800  
Fax +27 (0)56 531 4678  
E-mail: [erasmusc@destea.fs.gov.za](mailto:erasmusc@destea.fs.gov.za)


 CONVENTION ON  
INTERNATIONAL TRADE IN  
ENDANGERED SPECIES OF  
WILD FAUNA AND FLORA

<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

 EXPORT  
RE-EXPORT  
IMPORT  
OTHER

ORIGINAL

2. Valid until 17 April 2018

1. Exporter / Re-exporter (name, address and country) Hendrik Leibus enaghe Red Pine Taxidermy 44 Voorheker street Jacobsdal 8710			
3a. Country of Import United States of America			
5. Special conditions Permit is integrated with TOAS Regulations. Block 16 & 15 must be completed prior to export and re-export conditions attached. Bontebok was hunted on a registered Bontebok Ranch. 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. Permit / certificate valid for one consignment only.			
5a. Purpose of the transaction (see reverse) H		5b. Security stamp No. 1363498	
6. Name, address, national seal / stamp and country of Management Authority Department of Environmental Affairs Private Bag X447 PRETORIA 0001 SOUTH AFRICA			
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)
7.8 <i>Damaliscus pygargus pygargus</i> Bontebok		9. Skull	10. II (W)
11. Quantity (including unit) 01/one		11a. Total exported / quota 11a.	
12. Country of origin*		12a. Country of last re-export	
Permit No.		Certificate No.	
Date		Date	
12b. No. of the operation ** or date of acquisition ***		12b. No. of the operation ** or date of acquisition ***	
7.8 <i>Damaliscus pygargus pygargus</i> Bontebok		9. Horns	10. II (W)
11. Quantity (including unit) 01/one		11a. Total exported / quota 11a.	
12. Country of origin*		12a. Country of last re-export	
Permit No.		Certificate No.	
Date		Date	
12b. No. of the operation ** or date of acquisition ***		12b. No. of the operation ** or date of acquisition ***	
7.8 <i>Damaliscus pygargus pygargus</i> Bontebok		9. Cape	10. II (W)
11. Quantity (including unit) 01/one		11a. Total exported / quota 11a.	
12. Country of origin*		12a. Country of last re-export	
Permit No.		Certificate No.	
Date		Date	
12b. No. of the operation ** or date of acquisition ***		12b. No. of the operation ** or date of acquisition ***	
7.8 <i>Damaliscus pygargus pygargus</i> Bontebok		9. Backskin	10. II (W)
11. Quantity (including unit) 01/one		11a. Total exported / quota 11a.	
12. Country of origin*		12a. Country of last re-export	
Permit No.		Certificate No.	
Date		Date	
12b. No. of the operation ** or date of acquisition ***		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 South Africa			
Bloemfontein		13 October 2017	
Place		Date	
Security stamp, signature and official seal			
14. EXPORT ENDORSEMENT		15 Bill of Lading/Air Waybill Number:	
Block	Quantity		
A			
B			
C			
D			
Port of Export		Date	
Signature		Official stamp and title	

## Annexure B : CONDITIONS FOR PERMIT NO. 199482

Page 2

### PERMIT CONDITIONS FOR THE 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

OR Tambo International Airport is the only port designated for 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 aircraft within the Gauteng Province.

Import permits are not valid unless the imported consignment is accompanied by a valid (original) export permit from the country of origin (if required), which must be handed to the authorized Environmental Management Inspector on inspection.

#### THE FOLLOWING CONDITIONS ARE APPLICABLE TO:

- (A) ALL 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, AND SEA)

#### THIS PERMIT:

1. a) Shall not be transferable;  
b) Shall be invalid until the signature of the holder thereof been appended thereto;  
c) This permit is not valid unless it has been endorsed and released by an authorized Environmental Management Inspectorate 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 Inspectorate 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 Inspectorate 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 7.
3. Inspections are by appointment only and early booking is necessary. An authorized Environmental Management Inspectorate official may be contacted at the following telephone numbers during office hours (07:00 – 18:30):  
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, Waybill/s and Bill of entry/s (SAD/ DA 550) must be presented for inspection. A photo copy of all these documents must also be handed to the Environmental Management Inspectorate officer 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 of destination as shown on the containers must coincide with the country of destination as on the permit. The details on the packing list/s must coincide with the details on the permit/s and Waybill/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 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 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 of their delegated agents must inform the Environmental Management Inspectorate 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.
13. 18 October 2017

Signature of Issuing Officer

Date

Department of Economic & Small Business  
Development Tourism & Environmental Affairs

Signature of Recipient

Date

Full Name

Full Name

Conditions to this permit have been issued in accordance with The National Environmental Management: Biodiversity Act 10 of 2004, CITES Regulations 2010.

2017-10-18

Private bag X 20801  
Bloemfontein 9300  
Free State Province



# SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

Duration of Hunt:

Commenced: 11 / 05 / 2017

Terminated: 11 / 05 / 2017

FS No 208327

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

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Limpopo (LIM)	North West (NW)	Mpumalanga (MPB)	Western Cape (CNC)	Eastern Cape (EC)	Northern Cape (NC)
	X							

Post permit To (mark correct block with X)

PROFESSIONAL HUNTER
Name: <u>BEN BREYENBACH</u>
Business Address: <u>TORRE HUNTER STREET 70</u>
<u>PHILIPPOIS</u> Code: <u>9970</u>
I.D. No.: <u>8901055023084</u>
PH Permit No.: <u>JM 40 / 2017</u>
Date: <u>19/05/2017</u> Signature: <u>[Signature]</u>

CLIENT
Name: <u>Naught Norman</u>
Permanent Postal Address: <u>[Redacted]</u>
<u>Corpus Christi</u>
Code: <u>[Redacted]</u> Country: <u>TX</u>
Passport No.: <u>USA [Redacted]</u>
Tel./Fax: <u>[Redacted]</u>
Date: <u>19/05/2017</u> Signature: <u>[Signature]</u>

HUNTING OUTFITTER
Name: <u>Carel Maartens</u>
Business Address: <u>Otterskloof</u>
<u>Philippolis</u> Code: <u>9907</u>
I.D. No.: <u>7009035062086</u>
H.O. Permit No.: <u>357 / 2017</u>
Date: <u>19/05/17</u> Signature: <u>[Signature]</u>

Farm Name Registration No.	Magisterial District	Name and I.D. Number of Land Owner	Hunting Permit Certificate / Licence No.	Date of Hunt		Species Killed	Number Killed	Sex		Part of Trophy to be Exported
				From	To			♂	♀	
<u>Otterskloof</u>	<u>Philippolis</u>	<u>Al. Cerebus</u>	<u>1007/29065</u>	<u>11</u>	<u>19</u>	<u>Roun</u>	<u>1</u>	<u>✓</u>		<u>Cape / Skull / Back</u>
						<u>Lechwe</u>	<u>1</u>	<u>✓</u>		<u>Cape / Skull / Back</u>
						<u>Bontebok</u>	<u>1</u>	<u>✓</u>		<u>Cape / Skull / Back</u>
						<u>Reedbuck Mountain</u>	<u>1</u>	<u>✓</u>		<u>Cape / Skull / Back</u>
						<u>Kudu Rhebuck</u>	<u>1</u>	<u>✓</u>		<u>Cape / Skull</u>

Copies: Client Original White  
Hunting Outfitter 1st copy Pink Forward to Nature Conservation authority where hunt took place  
Professional Hunter 2nd copy Blue Retain for a period of three years  
Last copy Green Remain in book

Address to which export permit is to be sent: \_\_\_\_\_  
Code: \_\_\_\_\_



**WELL Worldwide Energy Logistics Inc.**  
17401 Aldine Westfield Road, Houston, Texas, 77073, USA.

Social Security No: (b) (6) Phone No: (b) (6)

**CUSTOMS POWER OF ATTORNEY** Acceptance of Terms and Conditions Know all men by these presents: That,  
Wyatt (b) (6) Norman (PRINT NAME), an individual residing at

(b) (6), Corpus Christi, TX (b) (6)  
(ADDRESS AS ON DRIVERS LICENSE)

hereby constitutes and appoints WELL Worldwide Energy Logistics, Inc. ("Broker"), its officers and 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 Customs; 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 Customs 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 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; This power of attorney to remain in full force 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 of two years from the date of its execution); Appointment as

Forwarding Agent: Grantor authorizes the above Grantee to act within the territory as a lawful agent and sign or endorse export documents (i.e. commercial invoices, bill of lading, insurance certificates, drafts and any other document) necessary for the completion of an export on grantor's behalf as may be required under law and regulation in the territory and to appoint forwarding agents on grantor's behalf; 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.

Grantor acknowledges receipt and acceptance of these Terms and Conditions of Service of Broker governing all transactions between all the Parties. This Power of Attorney constitutes authorization for you to forward all Customs entries, bills and related documents in care of our Forwarding Agent, Safari Specialty Importers, who arranges for the importing and international carriage of our merchandise pursuant to the executed Authorization to Import with them. This clause is intended to allow all parties to insure compliance with 19 CFR 111.36. We acknowledge that as importer of record payment to the broker will not relieve us of liability for Customs charges (duties, taxes or other debts owed Customs) in the event that the charges are not paid by the Broker/Forwarding Agent. We further acknowledge that Customs charges may be paid with a separate check payable to the "U.S. Customs" which shall be delivered to Customs by the broker.

In witness whereof, the said individual,

Wyatt (b) (6) Norman (PRINT NAME)  
has caused these presents to be sealed and signed:

Signature of Individual: Wyatt Norman

Date: 4/20/18 Witness Signature: [Signature]





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: 1A  
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 NNU 21 2017

LB

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

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

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

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

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue MA19855C-0 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter 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 understanding that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. (b) (6)	
Signature (in blue ink) 	Date of signature (mm/dd/yyyy) 11/14/2017

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.I. 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:  
Zambia, Mafunta GMA, Western Province, S15°49028; E025°15474, Kaoma
  - b. Date wildlife is to be hunted:  
06/01/2018-06/21/2018
  - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).  
Skull, Skin, 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: MVU Safaris  
Business Name: MVU Safaris  
Address: Plot # 6980 Katanga Road Lusaka  
Address: P.O. Box 35225 Lusaka  
City: Lusaka  
State/Province: Zambia  
Country, Postal Code: Zambia, 1010

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: \_\_\_\_\_

*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 Asai (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.

**MVU SAFARIS, LTD.**  
Address, 6980 KATANGA ROAD LUSAKA  
Operator email: m1saeed@hotmail.com

## **I. DESCRIPTION OF COMPANY AND CONCESSION**

Mvu Safaris Zambia Limited has been operating in Mufunta Concession since April 2011. The concession provides habitat for a range of species including Lion, Leopard, Antelopes, Hartebeest and Plains Game. The concession is on the Western boundary of the Kafue National Park. Mvu Safaris has entered into a ten year lease agreement with the wildlife authority and communities and is renewable subject to conducting successful conservation records of the Ecological system.

Our company is a Limited Company and maintains one resident Professional Hunter who also provides the duties of a Camp Manager. Other employees include four game trackers, eighteen anti-poaching scouts, and six camp staff (cooks, cleaning, miscellaneous). Altogether our operations support 152 dependents in local Villages. These beneficiaries come from the local community.

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 \$28,000 in Mufunta 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 made over \$3000 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	\$5900	Directly paid and some subsidies to WA
Scout equipment	\$5000	Clothing, vehicles, rations, phones, tents, etc.
Diesel / petrol	\$6300	For scouts and WA
Rations for WA and community scouts	\$7800	
Rewards	\$3000	For information and arrests
<b>TOTAL</b>	<b>\$28000</b>	

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.



***Bicycles and firearms recovered from poachers***



### **III. COMMUNITY PARTICIPATION**

#### **A. Community Assistance Component**

We make contributions to the Community Resource Boards (CRB) of about Forty Thousand Dollars (\$40,000) annually as per agreement which was entered into in 2011 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 the picture above members of the community waiting to receive Game meat which was legally hunted from Safari*

#### **B. Conflict Control**

We have very few Human Animal Conflicts and in most cases they are not serious in nature.

#### **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 and boreholes which costs approximately Seventeen Thousand Five Hundred Dollars Only (\$17500) to maintain annually 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.

#### **V. OTHER INFORMATION**

##### **A. Prey Base**

Mvu Safaris in Mufunta 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. 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 used this year to monitor the size and age for the Lion and keep records of the same.

##### **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 selectiveness.

Our approach as a company is to hunt lion which has reached an advanced and mature age only of minimum seven (7) years and above.

**D. U.S. Hunters**

Our largest clientele is from the United States of America (USA). 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 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 robs 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:** \_\_\_\_\_

**Title:** \_\_\_\_\_





mark asal

---

**From:** Vargas, Darcy <darcy\_vargas@fws.gov>  
**Sent:** Thursday, June 07, 2018 4:06 PM  
**To:** (b) (6)  
**Subject:** 63880C / Lion Trophy Import

Good morning Mr. Asal,


Ref: 63880C

Your referenced application request to import **one male** African lion trophy from **MVU Safaris, Lusaka, Zambia**, is under review. However, in order to complete processing your application, we need additional information. Therefore, please provide the following:

1. Provide documentation showing that the lion referenced in your application will be legally hunted within Mafunta GMA, Zambia.
2. Provide documentation that shows the age of the lion you are requesting to import.
3. If you are able to, please provide a signed copy of the MVU Safaris, LTD document enclosed in your application package.

**In accordance with 50 CFR 13.11(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.**

R  
respectfully,

Darcy Vargas   
Biologist  
US Fish and Wildlife Service  
MS: IA  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
[www.fws.gov](http://www.fws.gov)  
[www.cites.org](http://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=0016mDWXmIC-eCNJ4wf\\_4IA3WaTa8IzcuPb8jWWJtQIDE8kRHO2RaQ17v2A6OUJgeCSOizrh7ruV2Nz76Ues6ALGcio28DZ6UAnX5e55gpAQ4%3D](http://visitor.r20.constantcontact.com/manage/optin?v=0016mDWXmIC-eCNJ4wf_4IA3WaTa8IzcuPb8jWWJtQIDE8kRHO2RaQ17v2A6OUJgeCSOizrh7ruV2Nz76Ues6ALGcio28DZ6UAnX5e55gpAQ4%3D)



*Mvu Safaris*

Plot 2414,  
Freedomway South-End  
IDC Building  
P.O Box: 35225,  
Lusaka, Zambia  
Tel/Fax: +26-01-232422  
Mobile: 0977-431149

RCVD JUL 17 2018

4<sup>th</sup> July, 2018

The Director,  
USFWS  
United States of America

Dear Sir/Madam,

**RE: AGE LIMIT FOR LIONS HUNTED IN ZAMBIA**

We hereby wish to confirm that as per requirements by the Zambian government through the Department of National Parks and Wildlife Services, all Lions that are to be exported out of Zambia which were legally hunted are supposed to be five (5) years and above.

Any trophy that fails to meet this requirement is not permitted to be exported and the Professional Hunter together with the Safari outfitter will be punished accordingly.

Please do not hesitate to contact the Wildlife Authorities in Zambia for any further clarifications.

Yours faithfully

**MUHAMMAD SAEED ESSA  
DIRECTOR**

Original



NPW FORM 2

REPUBLIC OF ZAMBIA  
Zambia Wildlife Act, 2015  
(No 14 of 2015)  
THE ZAMBIA WILDLIFE  
(Licences and Fees) Regulations, 2007  
(Regulations 3 (2))

0000270  
S/No.....

Station of Issue.....

CHILANGA  
HUNTING LICENCE - NON RESIDENT

Date of Issue.....

30/05/18

DETAILS OF LICENSEE

Full Name Asal David

(b) (6)

Nationality American

NRC No./Passport No.....

(b) (6)

Tel/Mobile No.....

Age.....

Full Name of Safari Company.....

Mrvn

Safari

E-mail.....

Certificate of Incorporation No.....

Date of Incorporation.....

Postal Address.....

35225 LK

Residential Address.....

Firearm Licence/Tourist Firearm Import No.....

Calibre of Firearm.....

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 USS
Lion	1st	M	Mufumbira	2018	4200
			0000291		
			0043529		

Total Animals fees paid - the kwacha equivalent of  
Concession Fees paid - the kwacha equivalent of  
Grand Total the kwacha equivalent of

USS 4200  
USS  
USS 4200

Official Stamp

Chairperson of the Committee

Serial No. 555555



REPUBLIC OF ZAMBIA

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

NPW FORM 5B

S/No.: .....

0000541

Station of issue..... Chilanga ..... Date of Issue..... 30/05/18 .....

DETAILS OF PERMIT HOLDER

Full name: Asal David ..... (b) (6) ..... NRC/Passport No. (b) (6) .....

Tel/Mobile No.: ..... E-mail address: .....

Postal Address: Mvu Safaris ..... Residential Address: USA .....

DETAILS OF FIREARMS

Firearm Licence No(s) 1.: 791 ..... 2. .... 3. ....

Calibre(s) 1.: 360 ..... 2. 275 ..... 3. ....

DETAILS OF LICENCES, HUNTING AREA & HUNTING TYPE

Resident/Non Resident Hunting Licence No (s) .....

Bird Hunting Licence No. 0000767 .....

Hunting Type..... Non Resident .....

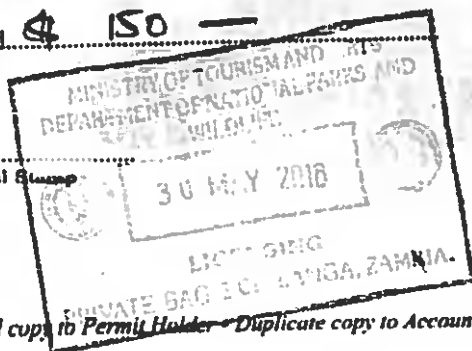
is hereby authorised to hunt in Lumimba Mufunta Game Management Area, .....

Mufunta Hunting block for ..... days from 31/05/18  
to 21/06/2018 (Dates inclusive)

Amount Paid \$ 150 .....

GRZ Receipt No. 643529 .....

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



# Mvu Safaris

Plot 2414,  
Freedomway South-End  
IDC Building  
P.O Box: 35225,  
Lusaka, Zambia  
Tel/Fax: +26-01-232422  
Mobile: 0977-431149

## **MVU SAFARIS, LTD.**

Address, 6980 KATANGA ROAD LUSAKA

Operator email: m1saeed@hotmail.com

### **I. DESCRIPTION OF COMPANY AND CONCESSION**

Mvu Safaris Zambia Limited has been operating in Mufunta Concession since April 2011. The concession provides habitat for a range of species including Lion, Leopard, Antelopes, Hartebeest and Plains Game. The concession is on the Western boundary of the Kafue National Park. Mvu Safaris has entered into a ten year lease agreement with the wildlife authority and communities and is renewable subject to conducting successful conservation records of the Ecological system.

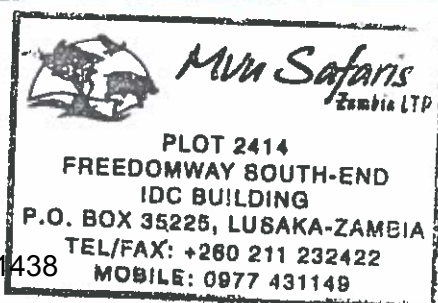
Our company is a Limited Company and maintains one resident Professional Hunter who also provides the duties of a Camp Manager. Other employees include four game trackers, eighteen anti-poaching scouts, and six camp staff (cooks, cleaning, miscellaneous). Altogether our operations support 152 dependents in local Villages. These beneficiaries come from the local community.

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 \$28,000 in Mufunta 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 made over \$3000 in payments of rewards to leads helping in the abduction of poachers. A breakdown of spending on anti-poaching is below.



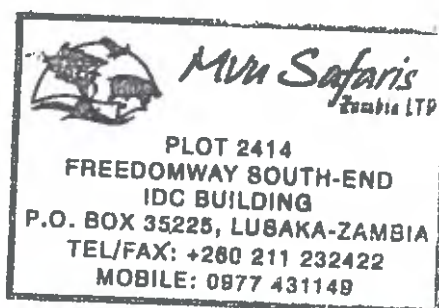


Item	Spend (USD)	Notes
Scout salaries	\$5900	Directly paid and some subsidies to WA
Scout equipment	\$5000	Clothing, vehicles, rations, phones, tents, etc.
Diesel / petrol	\$6300	For scouts and WA
Rations for WA and community scouts	\$7800	
Rewards	\$3000	For information and arrests
<b>TOTAL</b>	<b>\$28000</b>	

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.



**Bicycles and firearms recovered from poachers**



### III. COMMUNITY PARTICIPATION

#### A. Community Assistance Component

We make contributions to the Community Resource Boards (CRB) of about Forty Thousand Dollars (\$40,000) annually as per agreement which was entered into in 2011 by Mvu Safaris, the Community and the Wildlife Authorities.

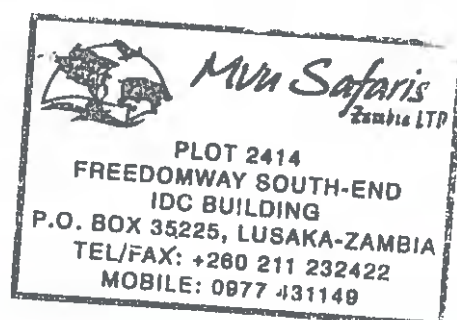
In addition to these direct contributions, we pledge to distribute at least 50% of game meat harvested to the villages.



*In the picture above members of the community waiting to receive Game meat which was legally hunted from Safari*

#### B. Conflict Control

We have very few Human Animal Conflicts and in most cases they are not serious in nature.



A number of potential Lion Trophy were not hunted this year because of our selectiveness.

Our approach as a company is to hunt lion which has reached an advanced and mature age only of minimum seven (7) years and above.

#### **D. U.S. Hunters**

Our largest clientele is from the United States of America (USA). 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 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 robs 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: GULLAM PATEL

Title: DIRECTOR







# 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-63880C

Enhancement Finding  
Applicant: David (b) (6) Asal (PRT-63880C)

David (b) (6) Asal submitted an application on November 21, 2017, 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 1, 2018, through June 21, 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. Asal's application involving a *P. l. melanochaita* sport-hunted trophy taken in the Mafunta 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. Asal'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 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. Asal'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 17<sup>th</sup> 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. Asal'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<sup>2</sup> of wildlife area (average 189 km<sup>2</sup> 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<sup>2</sup> (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<sup>2</sup> (approximately 10,000 km<sup>2</sup> 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<sup>2</sup> (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 of 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 unsustainable 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 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. Asal's hunting and subsequent import of this lion provides 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 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 undertaken by Mr. Asal will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Mr. Asal, 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. David Asal.

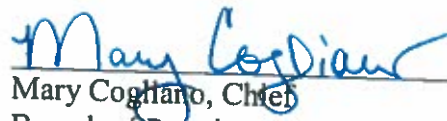
Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to him to successfully accomplish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

  
Darcy Vargas, Biologist  
Branch of Permits  
Division of Management Authority

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

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**Permit Number: MA63880C-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

CHIEF, BRANCH OF PERMITS, DMA

**Permittee:**

DAVID (b) (6) ASAL  
(b) (6)  
FARMVILLE, 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 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 MAY 08 2018

LB

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

Type of Activity

U.S. Fish and Wildlife Service  
Division of Management Authority  
Branch of Permits, MS: 1A  
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 <i>Costa</i>	1 b. First Name <i>Lawrence</i>	1 c. Middle Name (b) (6)	1 d. Suffix
2. Date of Birth (mm/dd/yyyy) (b) (6)	3. Telephone Number	3 a. Alternate Telephone Number	4. E-mail Address

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

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

**Section C: All applicants complete address information**

1 a. (b) (6)				
1 b. City <i>Nottingham</i>	1 c. State <i>NH</i>	1 d. Zip code/Postal code (b) (6)	1 e. County/Province	1 f. Country <i>USA</i>
2 a. Mailing Address (include if different than physical address, include name of company) (b) (6)				
2 b. City <i>Nottingham</i>	2 c. State <i>NH</i>	2 d. Zip code/Postal code (b) (6)	2 e. County/Province	2 f. Country <i>USA</i>

**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) <i>4/18/2018</i>

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.

*Lawrence Costa*  
(b) (6)

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?  
(b) (6)

*Rumford, ME*  
(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.

NA

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

African Elephant - *Loxodonta africana*

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:

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:

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:

Bwabwata National Park East GPS S 17° 41.998  
Kongolia Tanzania E 023° 22.041

b. Date wildlife was hunted:

8/31/17 - 9/12/17

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

*Ndumo Lodge, Kalambozo, Zambezi Region Namibia  
Poot Hunter Karl Stompke*

- 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]:

*Titus Schmidt  
The Yellow Shark Holdings (PTY) LTD Olympia - Windhoek  
Managing Director PO Box 81413 +264 (0) 61 304030  
Republic of Namibia*

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: *Titus Schmidt*  
Business Name: *The Yellow Shark Holdings (PTY) LTD*  
Address: *PO Box 81413*  
City: *Olympia - Windhoek*  
State/Province: *Namibia*  
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?

*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

*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: 9/18/2018

*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).



# TAX INVOICE



Ndumo Safaris (Pty) Ltd (Namibia)

P.O, Box 1667

Katima Mulilo

Namibia

www.huntingsafaris.net

Invoice no:

16026 / 7

DATE 9/15/2017

BILL TO

LARRY COSTA / (b) (6)

USA

DESCRIPTION	QTY	UNIT PRICE	AMOUNT
Contract number 16026	1	\$ 118,100	\$ 118,100
Contract number 16027	1	\$ 37,100	\$ 37,100
Extras:		\$ -	\$ -
Hippo	1	\$ 5,000	\$ 5,000
Crocodile	1	\$ 6,000	\$ 6,000
Impala	1	\$ 700	\$ 700
Kudu	1	\$ 1,500	\$ 1,500
Zebra	1	\$ 1,500	\$ 1,500
Charters	1	\$ 20,000	\$ 20,000
Leopard bait	1	\$ 375	\$ 375
Less:			\$ -
Credit Trophy fee	1	\$ (6,000)	\$ (6,000)
Credit Cathy day fees	1	\$ (500)	\$ (500)
Paid:			\$ -
Deposit 1	1	\$ (80,000)	\$ (80,000)
Deposit 2	1	\$ (75,000)	\$ (75,000)
Deposit 3	1	\$ (20,000)	\$ (20,000)

SUBTOTAL \$ 8,775

VAT RATE

VAT

OTHER COMMENTS

1. Total payment due in 30 days

Banking Details:

TOTAL \$ 8,775

VAT no.: 2695338-01-6

Thank You For Your Business



Fax +264-61-258 861

Fax +264-61-258 861

174477

31. 68.17

18.09.17

Permission is hereby granted in terms of the Nature Conservation Ordinance 1975 (Ord. 4 of 1975)

Name of Trophy Hunter:

L. (b) (6) Customer

Residential Address:

LISA

Country:

to hunt the specified number of game for the sake of trophies:

	SPECIES: COMMON NAME	Number
	Buffalo	2x
SNS 1	Crocodile, Nile	2x
	Dik-dik	/
	Eland	/
SNS 1	Elephant	2x
	Giraffe	2x
	Gray Duiker	2x
SNS 1	Hippopotamus	/
	Impala, Black-faced	/
	Impala, common	2x
	Klipspringer	2x
	Kudu	1x
SNS 1	Lechwe	/
	Oryx (Gemsbok)	/
	Ostrich	/
	Red hartebeest	/
	Reedbuck	/
SNS 1	Rhinoceros, black	/
SNS 1	Rhinoceros, white	/
	Roan	/
	Sable	/
	Springbok	/

SPD

Indicates species listed on CITES Appendix I or II

[illegible]

on the following farms / hunting concessions:

Bruce B. White, Esq.

Guided by (name of guides):

K. Stämpf, N. Nel &  
F. Rezzichenhart

Cashier receipt No.:

2148355

Issued on.

Official MET date stamp

Amount received:

MINISTRY OF ENVIRONMENT & TOURISM  
 Issued by: Atchabes. R. H. de  
 ISSUING OFFICER (NAME & SIGNATURE)

1470

The following certificate must be completed immediately after each animal that has been hunted (please print)

[illegible]

by a professional hunter, master hunting guide or hunting guide permit holder at all times while hunting.





RCVD MAR 08 2018

**PLEASE BE SURE TO MAIL THE COMPLETED CITES  
PERMIT TO:**

**D&L CHB, LLC  
1500 MIDWAY COURT, STE W201  
ELK GROVE VILLAGE, IL 60007  
CTC: LISA OR LAURA**





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:** Division of Management Authority (DMA)  
U.S. Fish and Wildlife Service  
4401 N. Fairfax Drive, Room 212  
Arlington, VA 22203  
1-800-358-2104 or 703-358-2104

**Type of Activity:**

**IMPORT OF SPORT-HUNTED BONTBOK TROPHIES FROM SOUTH AFRICA**

RCVD MAR 08 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 <b>Penner</b>	1 b. First name <b>Ray</b>	1 c. Middle name or initial	1 d. Suffix
2. Date of birth (mm dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
6 a. Telephone number	6 b. Alternate telephone number	6 c. Fax number <b>847-690-0699</b>	6 d. E-mail address <b>isa.j@alldh.com</b>

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)			
1 b. City <b>North Newton</b>	1 c. State <b>KS</b>	1 d. Zip code/Postal code	1 e. Country <b>USA</b>
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. Country

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue <b>No</b>
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. <b>ISA J. Penner</b> Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures)
	<b>2/25/2018</b> Date of signature (mm dd/yyyy)

**E. IMPORT OF SPORT-HUNTED BONTEBOK TROPHIES from South Africa**

**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 were 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:** The bontebok is listed as endangered under the Endangered Species Act. Applications for endangered species permits must be published in the Federal Register for a 30-day public comment period. Allow at least **90 days** for the application to be processed.

**Note 3:** This application can only be used if you have hunted/will be hunting in **South Africa**. If you have or will be hunting in a different country, please use form 3-200-20: <http://www.fws.gov/international/permits/by-form-number/index.html>

**Note 4:** USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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.

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 submit, indicate the application question number you are addressing. If applying for more than one trophy, be sure to indicate which trophy is addressed in each response.

1. How many Bontebok (*Damaliscus pygargus pygargus*) are you applying to import? Quantity: 1

2. At the time of the application, if bontebok is:

Alive, a. What is the approximate date of proposed take? n/A

Dead, b. What is the date you took the animal? 5/24/2017

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

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]:

3. ENTER the name and address of the landowner on whose property the bontebok was or will be taken:

Name

Street address

City/Province

Country, Postal Code

Universal Trophies  
Platt 114, Bashewa  
Pretoria, South Africa  
Julian Petros Theron  
Jules of the Karoo Sabrier  
P.O. Box 683  
De Aar South Africa

*Please be aware that the bontebok is listed in Appendix II of CITES. As such, you must obtain a CITES export permit from South Africa. If you are not exporting the trophy from South Africa directly to the United States, you will need to obtain a CITES Re-export certificate from the re-exporting country.*

4. a. Attach a signed statement from the landowner giving you permission to cull a bontebok from their captive herd. *see attached*
- b. If available, provide a copy of the landowner's Certification of Registration for the bontebok herd. (Note: this is not a copy of the export permit or certificate issued by a South African province.) In order to meet the criteria for a permit under the Endangered Species Act, the bontebok must be culled from a ranch that has been certified by the Government of South Africa under their bontebok program. If the ranch is not registered, we may be unable to issue an import permit.

5. **Complete name and address** of overseas person or business shipping the trophy to you (this name will appear on the face of the permit).

Name

Street address

City/Province

Country, Postal Code

*Universal Trophies  
Plot 116  
Bashewa  
Preterea South Africa*

**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(ies) 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**).

Taxidermist/Broker's signature: *Sisa Jemut*

Date: *2/25/2018*

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(ies) 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**).

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.*

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).

*Chicago*

- ~~9.~~ 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): DL CUA

1500 Midway Crt, Ste W201 Elk Grove Village IL 60007

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 state 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):

Lisa Jamnik lisa.j@dclhb.com  
847-690-0699

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.

**CUSTOMS POWER OF ATTORNEY**  
**and**  
**Acknowledgement of Terms and Conditions of Service**

Copyright 1995, National Customs Brokers and Forwarders Association of America, Inc.  
(Revised 07/04)

✓ appropriate box:

- ☒ Individual  
☐ Partnership  
☐ Corporation  
☐ Sole Proprietorship  
☐ Limited Liability Company

SS# \_\_\_\_\_

KNOW ALL MEN BY THESE PRESENTS: That, Ray Penner (Full name of individual, partnership, corporation, sole proprietorship, or limited liability company) (Identity) doing business as a INDIVIDUAL (Individual, partnership, corporation, sole proprietorship, or limited liability company) (Designation) under the laws of the State of Kansas, residing or having a principal place of business at Na Newton, Ks 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, unloading 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 Terms and Conditions of Service governing all transactions between the Parties.  
(Grantor's Name)

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 ✓ Ray [redacted] Penner  
(Full name of company)  
 caused these presents to be sealed and signed: (Signature) ✓ Ray [redacted] Penner  
 (Capacity) ✓ N/A Date: 12/5/11  
 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.



## JULES OF THE KAROO *Safaris*

Theron Family  
Plaatfontein  
PO Box 683  
De Aar, 7000  
South Africa  
[Info@julesofthekaroo.co.za](mailto:Info@julesofthekaroo.co.za)  
+27 53 631 3290  
VAT 4390218750

### TO WHOM IT MAY CONCERN

I, Julian Petrus Theron, ID 5403115005085, landowner of the farms Plaatfontein, Voëlfontein, Modderfontein and Selbourne with a valid permit (Fauna 076/2010) CAE: (393&394/2013NC) in the Richmond-district, Northern Cape, hereby grant permission to:

RAY [REDACTED] PENNER, PPH [REDACTED] from [REDACTED] NORTH NEWTON,  
KANSAS [REDACTED] USA

to hunt a Bontebok, (*Damalisca Pygargus Pygargus*), species occurring on the game farm permit, indicating that the herd of Bontebok does occur on the property and that the herd may be utilized for trophy hunting purposes without endangering the herd.

Yours truly,

Julian Petrus Theron

J.P. Theron ( ID 5403115005085 )

Member of: Northern Cape Game Ranchers' Association

Phasa & S C I

JULES OF THE KAROO SAFARIS  
HUNTING OUTFITTER Permit #: 005/2015NC CAE: 393/394 – 2013NC  
JP THERON PROFESSIONAL HUNTER PH 031/2015NC  
IP THERON PROFESSIONAL HUNTER PH 026/2012NC & 081/2012EC  
PJ THERON PROFESSIONAL HUNTER PH PH NC (being allocated)



# SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

DURATION OF HUNT: Commenced 24 / 05 / 2017 Terminated 29 / 05 / 2017

NC 20169

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)	Mpumalanga (MP)	Western Cape (WC)	Eastern Cape (EC)	Northern Cape (NC) <input checked="" type="checkbox"/>
---------------------	-----------------	--------------	---------------------	-----------------	-----------------	-------------------	-------------------	--

POST PERMIT TO (mark correct block with X):

**PROFESSIONAL HUNTER**

Name: JP THERON

Business Address: POSBUS 683  
De Aar

Code: 7000

I.D. No: 5403115005085

PH Permit No: 031-2015 NC

Date: 24.05.17 Signature: [Signature]

**CLIENT**

Name: Ray Penner

Permanent Postal Address: [Redacted]  
North Newton KS

Code: [Redacted] Country: USA

Passport No: [Redacted]

Tel/Fax: -

Date: 24.05.17 Signature: X Ray Penner

**HUNTING OUTFITTER**

Name: Sales of the Karoo

Business Address: Platfontein  
PO Box 683 De Aar Code: 7000

I.D. No: 5403115005085

Tel No: 0536313290 Fax No: -

HO Permit No: 005-2017

Date: 24.05.17 Signature: [Signature]

Farm Name Registration No.	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No.	Date of Hunt		Special Killed/Wounded	Number killed or wounded	Sex		Part of Trophy to be exported
				From	To			♂	♀	
Platfontein	Richmond	JP. Theron	393 & 394	24	29	Springbok	5	S		5xSC 5xBS 5xS&H
Wanderboom		Platfontein	-2013 NC			Bontebok	1	1		1xFS 1xS&H
		PO Box 683				Blesbok	9	9		9xFS
		De Aar				Springbok	1	1		1xFS
		7000				Impala	1	1		1xS&H 1xFS
						Blue Wildebeest	1	1		1xSC 1xBS 1xS&H

Copies: Client Original

Hunting Outfitter 1st copy - Forwarded to Nature Conservation Authority where hunt took place

Professional Hunter 2nd copy - Retain for a period of three years

3rd copy - Remains in book

Address to which trophies are to be sent: \_\_\_\_\_

Country: \_\_\_\_\_

Trophy Export Date (Estimate): \_\_\_\_\_

Code: \_\_\_\_\_



393 &amp; 394 2013 NC

Biodiversity  
Northern Cape Province

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Issued in terms of the provisions of: Regulation 28  
of the National Environmental Management Act:  
Biodiversity Act 10 of 2004; Threatened or  
Protected Species Regulations

SERIES

YEAR

GAME FARM HUNTING PERMIT / PERMISSION  
PERSONAL EFFECTS PERMIT / PERMISSION

Issued in terms of the provisions of: Section 39  
and 41 of the Nature and Environmental  
Conservation Ordinance 19 of 1974

## LANDOWNER / PERMIT HOLDER

Julian Petrus Theron 5403115005085 - Physical Address: Plaafontein - Postal Address: PO Box 683, De Aar, Northern Cape, 7000  
De Aar Northern Cape Province 7000 RSA Home Phone: 0536313290 Mobile Phone: +27733181181 Fax Number: 0536317158

## GAME FARM / FACILITY

Plaafontein Game Camp

## (i) CLIENT

Hunting client full name: Ray Penner  
ID or Passport number: [REDACTED]  
Physical address: [REDACTED]  
Vehicle Reg. Number: NORTH NEWTON KS [REDACTED]

## (ii) ARRIVAL

(dd/mm/yyyy) 24.05.2017

## (iii) DEPARTURE

(dd/mm/yyyy) 29.05.2017

## (iii) HUNTING OUTFITTER

Name: Sales of the Kraai

## (v) PROFESSIONAL HUNTER

HC Number: 005-2017 NC

Name: SP THERON

Tel No: 053 6313290

PH Number: 031-2017 NC

## (iv) HUNTING WEAPON

Tel No: 053631 3290

## (vii) HUNTING METHOD

(v) SPECIES HUNTED	NUMBER AUTHORISED	NUMBER ACTUALLY HUNTED	(vi) SPECIES HUNTED	NUMBER AUTHORISED	NUMBER ACTUALLY HUNTED
Springbok	6	6	Black Wildebeest	1	1
Reedbuck	1	1			
Blackbuck	2	2			
Impresso	1	1			

## HUNTING PERIOD / ACTUAL DATE OF HUNTING

From (dd/mm/yyyy) 24.05.2017

To (dd/mm/yyyy) 29.05.2017

## DECLARATION BY LANDOWNER / PERMIT HOLDER:

- a) I hereby certify that the above mentioned hunter, legally hunted on the above mentioned farm or property, during the above mentioned period, the animal/s as specified in the table above.  
b) I hereby authorize the above mentioned hunter to buy, to remove, to convey or transport the carcass / specimen from the above mentioned farm or property, to his / her residential / physical address.  
c) I hereby donate / give the carcass / specimen to the above mentioned hunter / client.

## DECLARATION BY HUNTER:

I hereby take note of the following:

- a) that I can buy and hunt the above mentioned animals from the landowner.  
b) that I am allowed to field dress, process, and transport the carcass and to temporarily possess the dead specimen or derivative thereof, for a maximum period of 1 (one) year calculated from the day of the hunt.  
c) that I 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 (issuing authority, in my province of residence, if still in possession of any carcass, derivative, part, specimen or trophy of the animal successfully hunted.  
d) that I will return the original "Game Farm Hunting Permit / Permission" together with my application for a possession permit.

X Ray Penner  
Signature - Hunter and Date

Signature - Landowner / Permit Holder and Date  
24.05.2017

Page 1 of 1

Signature of Issuing Authority

21 May 2013

Date of Issue

Signature of Permit Holder

24.05.2017

Date of Signature

Department of Environment and Nature Conservation - 90 Long Street - Private Bag X 6192, Kimberley 8300  
(HQ - Kby) Tel: 053-807 7430 Fax: 053 5151 769 (Cal) Tel: 027-341 1779 Fax: 027-341  
(Kuruman) Tel: 053-712 0702 Fax: 053-71 (Upf) Tel: 054-3322885 Fax: 054-33 (De Aar) Tel: 053-6310 601 Fax: 053-63





**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: 1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

Type of Activity

**Import of Sport-hunted Trophies of Southern  
African Leopard and Namibian Southern White  
Rhinoceros**

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 <b>Senrod</b>	1 b. First Name <b>Nick</b>	1 c. Middle Name/Initial <b>(b) (6)</b>	1 d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number	3 a. Alternate Telephone Number	4. E-mail address

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

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

**Section C: All applicants complete address information**

1 a. Physical address (Street address; Apartment #, Suite #, or Room #, no P.O. Boxes) <b>(b) (6)</b>				
1 b. City <b>Spring Creek</b>	1 c. State <b>Nevada</b>	1 d. Zip code/Postal code <b>(b) (6)</b>	1 e. County/Province	1 f. Country <b>U.S.A.</b>
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 <i>Title 50 Part 13 of the Code of Federal Regulations</i> and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)  <b>(b) (6)</b> <b>04/03/2018</b>	
Please continue to next page	

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND  
NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit to the address on page one.**

**Note 2:** 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:** *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 4:** Certain hunting trophies, including leopard 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.

- **Complete all questions on the application.**
- **Mark questions that are not applicable with "N/A".**
- **If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.**
- **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)?

Cherish Senrud

(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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

a. Leopard (*Panthera pardus*) Quantity: \_\_\_\_\_ (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20.

b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia  
Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).

c. African Elephant from Zimbabwe Quantity: 1 (2 + uske)

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 ANIMAL HAS ALREADY BEEN TAKEN, please enter the following:

d. 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:

Makuti Pool, Mashonaland West  
Harare, Zimbabwe

e. Date wildlife is to be hunted:

09-01-2014 to 09-14-2014 (animal already harvested)



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

Warren Thorn

- g. 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]:

National Parks (ZPWMA)  
P.O. Box CY 140, Causeway, 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.

- a. 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: National Parks (ZPWMA)  
Business Name:  
Address: P.O. Box CY 140 Causeway  
Address:  
City: Harare, Zimbabwe  
State/Province:  
Country, Postal Code:

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

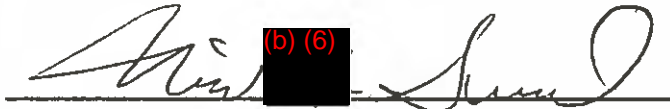
9. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

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:** \_\_\_\_\_

10. 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: 4-03-2018

*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.*

11. 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).

**CERTIFICATE OF OWNERSHIP OF IVORY AND RHINOCEROS HORN**

(Issued in terms of section 77 of the Parks and Wildlife (General) Regulations, 1990)



Cert. No 107587

Name Nick (b) (6) CENAUD

(b) (6)

Address PARKWAY SPRING

COCK NEWTON, USA

Tusk serial number ZW/2014206

Tusk mass (kg) 1300g

Tusk length (metric) 139 CM

Sex MALE

Authority 021809

Signature of holder

Notes

1. This certificate must be returned to the Director, Department of National Parks and Wildlife Management, P.O. Box CY 140, Causeway, in the event of the tusk being cut up for manufacturing purposes, lost, stolen or exported.
2. Transfer/sale of ivory or horn is to be done at National Parks offices.

**CERTIFICATE OF OWNERSHIP OF IVORY AND RHINOCEROS HORN**

(Issued in terms of section 77 of the Parks and Wildlife (General) Regulations, 1990)



Cert. No 107588

Name Nick (b) (6) CENAUD

(b) (6)

Address PARKWAY SPRING

COCK NEWTON, USA

Tusk serial number ZW/2014205

Tusk mass (kg) 1600g

Tusk length (metric) 142 CM

Sex MALE

Authority 021809

Signature of holder

Notes

1. This certificate must be returned to the Director, Department of National Parks and Wildlife Management, P.O. Box CY 140, Causeway, in the event of the tusk being cut up for manufacturing purposes, lost, stolen or exported.
2. Transfer/sale of ivory or horn is to be done at National Parks offices.

# 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)

**0000021809**  
ACQUITTED

### 1. DETAILS OF THE SAFARI OPERATOR

**Name of Operator** Zimbabwe Parks (ZPWMA)

**ZTA (HOP) No.** HOP0000

**Address** P O Box CY140,  
Causeway,  
HARARE

**Name of Professional Hunter** WARREN THORN

**Telephone**

**Number of Accompanying Guests**

**Are the trophies being exported after tanning and mounting?**

**Are the trophies being exported after primary treatment?**

**Name of Processing Agent or Taxidermist** CHIPITANI SAFARI COMPANY P/L

**Name of Shipping Agent**

**Name of Foreign Agent**

**Client's Full Name** NICK (b) (6) SENRUD

**Passport Number** (b) (6)

**Country of Issue** UNITED STATES

**Address** (b) (6)

**Licence No.** 494

**Fax** 10

10

No

Yes

**Address** 8 RIVONIA ROAD  
MOUNT PLEASANT  
HARARE

**Address**

**Address**

### 2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Makuti Pool	Mashonaland West	
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

**Date of Safari From** 01-09-2014

**Date of Safari To** 14-09-2014

**Daily Rate Charged For Big Game USD** 1,200 00

**Daily Rate Charged For Plains Game USD** 1,200 00

**Daily Rate Charged for Non hunting guests USD** 200.00

**Number of Accompanying Guests** 10

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	23-OCT-2014	ZEP/8888	11-MAY-2015	USD	51,550	47,470.4
2						
3						
4						

#### (ii) Taxidermist

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1	26-JUN-2015	FEP/12297	03-JUL-2015	USD	51,550	650
2						
3						
4						

### 4. FINANCIAL DATA

Total Daily rate	25,200.00	Total Guests rate	2,000.00
Less Commission	4,087.92	Total Trophy fees	22,660.00
Other fees (Incidentals)	1,690.00	Grand Total USD	47,462.08
Percentage Commission Charged	7.93	Total Processing Fees	650.00

### 5. DETAILS OF SPECIES HUNTED

	SPECIES	SEX	W/K	CONCESSION/FARM	GRID REF	DATE SHOT	SCI TROPHY SIZE	TROPHY FEES
1	ELEPHANT - WITH TUSKS	M	Killed	Makuti Pool	5161946	07-SEP-2014		13,500
2	LEOPARD	M	Killed	Makuti Pool	5161429	07-SEP-2014		3,700
3	BUFFALO	F	Killed	Makuti Pool	5161524	04-SEP-2014		950
4	BUFFALO	M	Killed	Makuti Pool	5161729	09-SEP-2014		3,500
5	GUINEA FOWL	F	Killed	Makuti Pool	5161729	04-SEP-2014		10
6	ZEBRA	M	Killed	Makuti Pool	5161347	02-SEP-2014		1,000
7								
8								
9								
10								
11								
12								
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15								
16								
17								
18								
19								
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30								

I .....hereby certify that the information given in this return is, to the best of my knowledge, true and correct.

Signature of Foreign Client \_\_\_\_\_

Date \_\_\_\_\_

Signature of Professional Hunter \_\_\_\_\_

Date \_\_\_\_\_

Signature of Safari Operator \_\_\_\_\_

Date \_\_\_\_\_







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 10 2018

LB

Return to: U.S. Fish and Wildlife Service  
Division of Management Authority (DMA)  
Branch of Permits, MS. 1A  
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 Jones	1.b First name Captain	1.c Middle name or initial (b) (6)	1.d Suffix
2 Date of birth (mm/dd/yyyy) (b) (6)	3 Social Security No. (b) (6)	4 Occupation (b) (6)	5 Affiliation/ Doing business as (see instructions)
6.a Telephone number (b) (6)	6.b Alternate telephone number	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 NA		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 Midland	1.c State Texas	1.d Zip code/Postal code (b) (6)	1.e County/Province	1.f Country 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 <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue _____ No <input checked="" type="checkbox"/>
3	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) _____ Date of signature (mm/dd/yyyy) 12/20/2017

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.

Panthera Pardus/ African Leopard

- 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:

NA

- b. Date wildlife is to be 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

**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):

Muanza, Mozambique

- b. Date wildlife was hunted:

September 10, 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, 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]:

BULL'S EYE TAXIDERMY, Open season farm, Corner Melkriver and Sterkstroom road, Vaalwater 0530, 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: BULL'S EYE TAXIDERMY, Open season farm, Corner Melkriver and Sterkstroom road,  
Business Name: Vaalwater 0530, South Africa  
Address:  
Address:  
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:  \_\_\_\_\_ 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):

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):

Cap Jones (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.







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

OMB No. 1018-0164  
Expires 11/30/2016

RCVD JAN 10 2018

LB

Federal Fish and Wildlife Permit Application Form

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

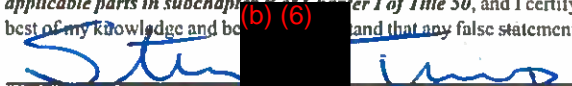
Type of Activity:  
**Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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 Travis	1.b. First name Steven	1.c. Name or initial (b) (6)	1.d. Suffix Mr.
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Occupation (b) (6)		
4. Affiliation/ Doing business as (see instructions) (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 Cypress	1.c. State Texas	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province (b) (6)	1.f. Country U.S.A
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

D. All applicants MUST complete	
1.	Attach check or money order payable to the <b>U.S. FISH AND WILDLIFE SERVICE</b> in the amount of <b>\$100</b> , nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in <b>Title 50, Part 13 of the Code of Federal Regulations</b> 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, and that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature of applicant/person for permit (No photocopied or stamped signatures) <span style="float: right;">11/2/2018 Date of signature (mm/dd/yyyy)</span>

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: n/a (Import is limited to two per hunter per calendar year)  
**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: n/a (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:

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

Tanzania GIS coordinates S. 04deg 18.116 E.031 deg 38.943 Sept 23, 2017

- 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):

Skin, skull, claws 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 document]:

East Africa Trophy Hunters Ltd Farm 604 Kirani, Arumeru Dist 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 appear on the face of the export permit].

Name: Business East Africa Trophy Hunters Ltd  
Name: Address P.O. Box 34169  
Address: Dar es Salaam  
City: Tanzania  
State/Province:  
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:  \_\_\_\_\_

Date: 11/2/2018

*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 proposed activity. While the Service will attempt to assist where possible, 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 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):

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):  
Steven Travis 713-494-9929 steven.travis@gmail.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.

## THE UNITED REPUBLIC OF TANZANIA

## IMPORT LICENCE

B 008436

Regulation 6(1) of the Arms and Ammunition Regulations (Cap. 223 of the Laws)

Station D'SALAAM SPECIAL ZONELicence is hereby granted to (Name in full) MR STEVEN TRAVIS  
of (address) 2 TAWA

\*who holds valid Private Arms Warehouse Licence No.....

granted at.....on.....or \*who may,  
subject to the application to possess this fire-arm proving successful, be issued with an Arms Licence  
in Tanzania to import the following Arms and Ammunition:

Type	Calibre	Make	Marker's No.
<u>RIFLE</u>	<u>416</u>	<u>RIGBY</u>	<u>750-03045</u>
<u>RIFLE</u>	<u>300</u>	<u>H&amp;H MAG</u>	<u>134-34117</u>

Quantity and description of Ammunition 200 ROUNDSfrom (Name of the firm and/ or Place) U.S.ASpecial conditions: To report to the Customs Officer at the Port or Place of Importation or entry  
into Tanzania.Date: 12-09 20 17

Regional Police Commander

\*Delete as necessary For: COMMISSIONER OF POLICE  
D'SALAAM SPECIAL POLICE ZONE

Original to Importer.

Duplicate to C.A.R.

Triplicate to be retained in Book.

BLUE CLASSIC

(b) (6)

(b) (6)

(b) (6)

1/2 20 18

PAY TO THE ORDER OF US Fish + Wildlife Service \$ 100

One hundred <sup>00</sup>/<sub>100</sub>

DOLLARS

AMEGY BANK  
P.O. BOX 27459  
HOUSTON, TEXAS 77227-7459

FOR Cites Permit

(b) (6)

(b) (6)

MP



# 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.  
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SHANE MAHONEY  
RENEE SNIDER

April 9, 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 APR 10 2018

Re: Applications for Permits to Import Sport-Hunted Trophies

Dear Acting Chief:

Enclosed please find three applications for permits to import sport-hunted trophies.

- The first applicant is hunting an elephant on a Game Management Area in Zambia. Funds from the hunting are used for community support and anti-poaching. Fifty percent of the animal fees are directly shared with the resident community, and at least 50% of the harvested game meat is shared with the community. This area maintains healthy populations of elephant and other species. Please consider the enclosed information and information in the DMA's files regarding the benefits of elephant hunting in Zambia, including the Non-Detriment Findings and responses to information requests, in making a positive enhancement finding for this applicant.
- The second applicant is hunting a lion in the Lower Lupande Game Management Area in Zambia, with Werner van Noordwyk/Kwalata Safaris. That area has a healthy lion population. The company invests extensively in anti-poaching (>\$57,000/year), pays the salaries of community game scouts, and distributed \$27,500 in game meat to the community, among other things. The company is contractually bound to fund community projects of at least \$15,000/year. Please see the attached report, which was previously provided to the DMA. We will send an updated report soon. Please consider this report and other information received from Conservation Force and Zambian authorities and operators in making a positive enhancement finding for this applicant.
- The third applicant hunted an elephant at the Save Valley Conservancy in Zimbabwe. Conservation Force and Zimbabwe's Parks and Wildlife Management Authority have submitted extensive documentation about the healthy elephant 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 (related to the African lion) and describing the SVC's strong wildlife management. Please also see the attached declaration from Wilfried Pabst. This declaration ended up not being submitted in court, but it remains a sworn statement that reflects the healthy elephant population at SVC. Please consider all this 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

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

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.

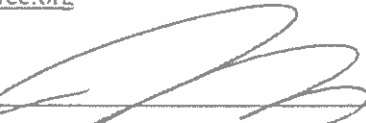
I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my elephant trophy at the following address:

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](mailto:jwj-no2@att.net)  
E: [regina.lennox@conservationforce.org](mailto:regina.lennox@conservationforce.org)

Signed: \_\_\_\_\_

Name: \_\_\_\_\_

Date: \_\_\_\_\_



JAMES LESSIG

3/26/18



Department of Interior  
U.S. Fish and Wildlife Service

RCVD APR 10 2018

LB

## Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service  
Division of Management Authority  
Branch of Permits, MS: 1A  
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 <b>LESSIG</b>	1.b. First Name <b>JAMES</b>	1.c. Middle Name/Initial <b>(b) (6)</b>	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address

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

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax Identification No.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer last name	4.b. Principal officer first name	4.c. Principal officer middle name/initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

## Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) <b>(b) (6)</b>				
1.b. City <b>LITTLETON</b>	1.c. State <b>COLORADO</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>
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) <b>3/21/2018</b> 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

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

JIM LESSIG

(b) (6)

(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.

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:

ZAMBIA - LUAWATA HUNTING BLOCK  
GPS CO-ORDINATES S12.40783 E032.17170

b. Date wildlife is to be hunted:

JULY 7, 2018 - JULY 20, 2018

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

SITATUNGA RANCHING & SAFARIS LIMITED

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: **AADIL DAYA**  
 Business Name: **SITATUNGA RANCHING & SAFARIS LIMITED**  
 Address: **P.O. BOX 39498, PLOT #7301, KAMBALA ROAD, LIGHT INDUSTRIAL M**  
 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?

**350-800 ELEPHANTS**

- 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?

**? AMOUNT. THE COMMUNITY & GOVERNMENT RECEIVE PART OF THE FUNDS. COMMUNITY USES FUNDS TOWARDS IMPROVING SCHOOLS, CLINICS, ETC. GOVERNMENT & SAFARI OPERATOR USE FUNDS TOWARDS GAME MANAGEMENT, SCOUT SALARIES, REHAB OF ROADS & ANTI-POACHING.**

- 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 SAFARI OPERATOR HAS EMPLOYED ADDITIONAL GAME SCOUTS FOR ANTI-POACHING & IS SOLELY FUNDED BY OPERATOR. THE OPERATOR SINKS BOREHOLES FOR THE COMMUNITY IN STRATEGIC LOCATIONS WITHIN THE COMMUNITY. THE OPERATOR GIVES MEALIE MEAL, CLOTHING & BLANKETS TO ABOUT 3,000 FAMILIES PER YEAR**



**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: 3/21/2018

*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).



### **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](mailto:cf@conservationforce.org)

Signed: \_\_\_\_\_



Name: James Lines

Date: April 2, 2018



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

LB

Return to: U.S. Fish and Wildlife Service  
Division of Management Authority (DMA)  
Branch of Permits, MS 1A  
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 Lines	1.b. First name James	1.c. Middle name or initial (b) (6)	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 Colleyville	1.c. State TX	1.d. Zip code/Postal code (b) (6)	1.e. County/Province	1.f. Country 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 – <b>attach documentation of fee exempt status as outlined in instructions.</b> (50 CFR 13.11(d))	
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in <b>Title 50, Part 13 of the Code of Federal Regulations</b> and the other <b>applicable parts in subchapter B of Chapter I of Title 50</b> , 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) <i>James Lines</i>	Date of signature (mm/dd/yyyy) April 2, 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)?

James Lines (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, 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*



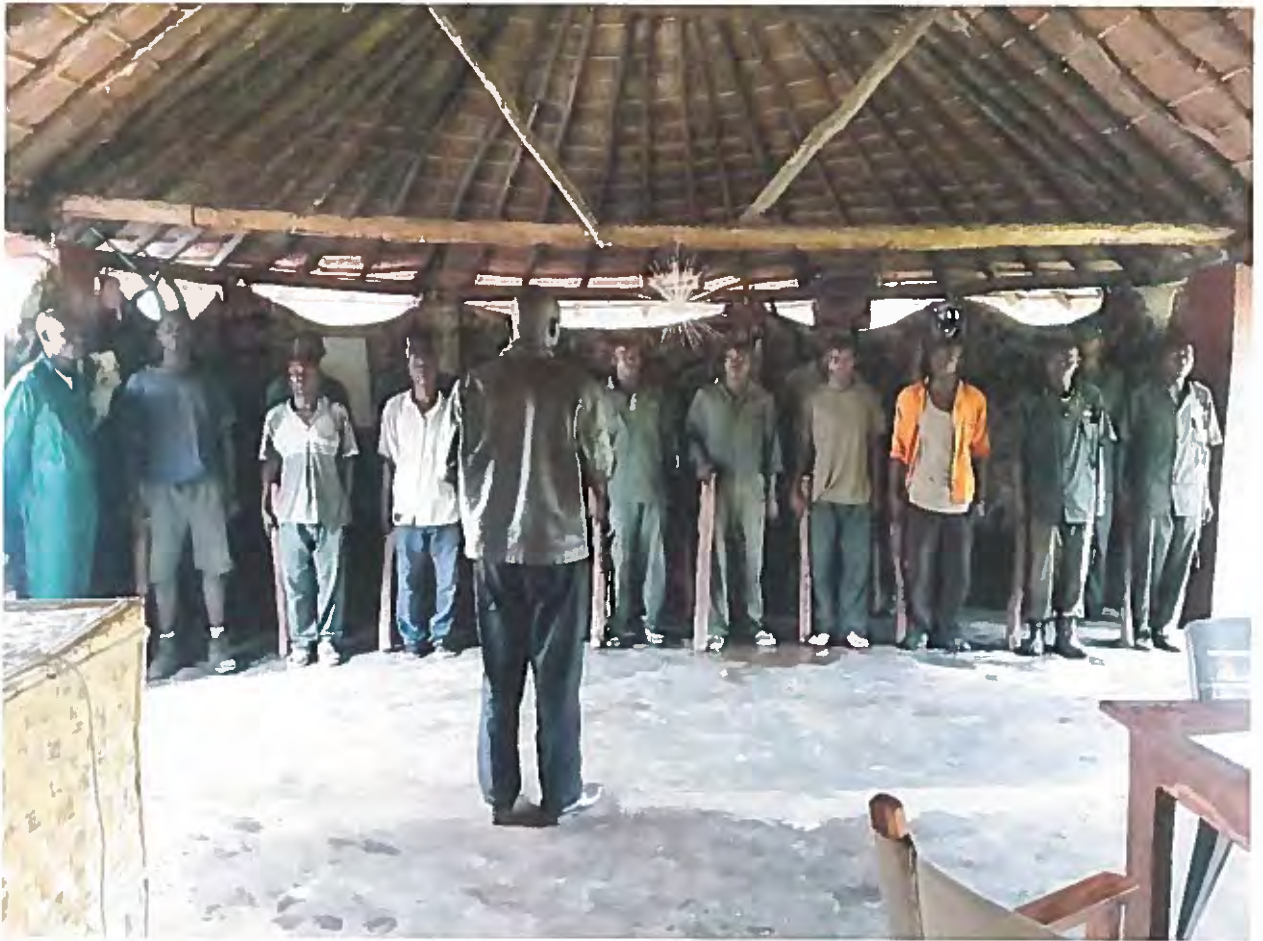


***In the picture above an elephant which was poached had its tusks removed***



***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
<b>TOTAL</b>	<b>\$ 57400</b>	

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 which 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
	<b>TOTAL</b>	<b>\$ 33500</b>

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 ② LTD  
Title: DIRECTOR

(b) (6)

32-61/1110

DATE

4-1-18

\$ 100<sup>00</sup>/<sub>100</sub>

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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 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 17<sup>th</sup> 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<sup>2</sup> of wildlife area (average 189 km<sup>2</sup> 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<sup>2</sup> (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<sup>2</sup> (approximately 10,000 km<sup>2</sup> 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<sup>2</sup> (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 of 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 unsustainable 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 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 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 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 undertaken 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

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

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**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

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).

### 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 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: \_\_\_\_\_

BRYAN (b)  
(6) OTTOMERS

Date: \_\_\_\_\_

3.19.2018



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: 1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

Type of Activity:

RCVD APR 10 2018

**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 <b>OTTMEERS</b>	1.b. First name <b>BRYAN</b>	1.c. Middle name or initial <b>(b) (6)</b>	1.d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	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>(b) (6)</b>					
1.b. City <b>BOERNE</b>	1.c. State <b>TEXAS</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>	
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 – <b>attach documentation of fee exempt status as outlined in instructions.</b> (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) <i>[Signature]</i>	Date of signature (mm/dd/yyyy) <b>03/19/2018</b>

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)?  
*Applicant PAGE ONE.*
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*

b. Sex (if known). *MALE / BULL*

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: *08/01/2015 - 08/14/2015*

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:

*ZIMBABWE*

*SAVE CONSERVANCY*

*SANGO LODGE, MASVINGO PROVINCE*

b. Date wildlife was hunted: *08/01/2015 - 08/14/2015*

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

*ZAMBEZI HUNTERS, THIERRY LABAT, PH.*

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: ZAMBEZI HUNTERS

Address: 2 PECKHAM RD. NEW LANDS ~~DEL~~

City: NEW LANDS, ~~DEL~~ HARARE ZIMBABWE

State/Province: MASVINGO

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:**  **Date:** 5.20.2018

*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).

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

FRIENDS OF ANIMALS, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 17-cv-002530-RCL
	)	
Ryan ZINKE, <i>et al.</i> ,	)	Judge Royce Lamberth
	)	
Defendants, and	)	
	)	
SAFARI CLUB INTERNATIONAL <i>et al.</i> ,	)	
	)	
Intervenor-Defendants.	)	
	)	

---

**DECLARATION OF SAVÉ VALLEY CONSERVANCY  
IN SUPPORT OF MOTION TO INTERVENE**

I, Wilfried Pabst make the following declaration in support of the attached Motion to Intervene.

1. I make this declaration based upon my personal, first-hand knowledge.
2. I make this declaration on behalf of Savé Valley Conservancy ("SVC"). I own the Sango Ranch, one of the properties that together form the conservancy. I am involved in all aspects of operating SVC and decision-making related to the management of habitat and wildlife, poaching control, community investment, research, and similar issues.
3. SVC is one of the largest private game reserves in Africa. It is in the South East Lowveld of Zimbabwe and provides approximately 3,500 km<sup>2</sup> of diverse wildlife habitat for healthy populations of elephant, lion, leopard, buffalo, rhino, and rare African Wild Dogs.
4. SVC consists of privately-, government-, and community-owned properties aligned under a constitution to manage animal populations on a landscape scale. Each property operates its own tourist lodges offering different types of accommodations in varied ecological settings. While

predator spoor count is conducted as well. A Technical Advisory Committee recommends evolving best wildlife management practices.

8. SVC's anti-poaching efforts are extensive. Approximately 200 game scouts patrol the various ranches to pick up snares and keep meat poaching under control. A special team of 30 to 40 highly-trained scouts, the Special Species Protection Unit (SSPU), combats elephant and rhino poaching specifically. Annual anti-poaching expenses (ranger salaries, training, vehicles, equipment, petrol, and other necessities) are almost \$500,000. We hope to expand the SSPU to 50 individuals at the cost of another \$100,000 per year.

9. In the past 25 years, SVC's elephant population has quadrupled from the original, translocated individuals. The population is estimated at 2,200. Elephant management is guided by an adaptively-implemented plan incorporating regulated hunting to achieve management targets. The annual hunting quota is seven elephants, representing only 0.3% of the population. Those few hunts generate significant revenue that is reinvested in management and protection, including for the large black rhino population, which is not currently hunted.

10. After SVC was established and as ungulate populations increased, lion began to recolonize the conservancy and thirteen lions were reintroduced, including ten on Sango ranch. After an initial lag period, the population has flourished. Annual monitoring began in 1999. Since 2007, annual monitoring is conducted using track index surveys in a research project co-sponsored with the African Wildlife Conservation Fund. In 2011, those survey results were verified using a baited call-up. Prey availability models suggest SVC's carrying capacity for lion is approximately 271. The 2015 population was estimated at 284. This suggests lion have reached the ecological carrying capacity, even though responsibly hunted.



and schools, providing computer equipment, etc. SVC entered into an agreement with local Chiefs to share revenues from regulated hunting and sales of game meat.

16. Over 90% of SVC's hunting clients are U.S. citizens—and this percentage is 100% on some properties. SVC relies on these U.S. clients to fund its extensive anti-poaching efforts and science-based elephant and lion management. At least three U.S. hunters have applied for permits to import lion or elephant trophies hunted in SVC in 2015, 2016, and 2017.

17. SVC's revenues will decline if elephant and lion trophies are not importable into the U.S. Consequently, its excellent management efforts will suffer. The quotas will not change (and did not change when the U.S. Fish and Wildlife Service suspended the import of elephant trophies from Zimbabwe or listed the lion as threatened under the U.S. Endangered Species Act). However, the willingness of U.S. citizens to pay premium prices was reduced by these policy decisions, and in turn, SVC's revenues were reduced. These revenues will be cut further if imports remain closed. Unfortunately, the conservancy's elephant, lion, rhino, and other wildlife populations will pay the price if anti-poaching efforts and community investment and conflict mitigation expenditures must be reduced as well.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

February 19, 2018

A handwritten signature in black ink, appearing to read 'Wilfried Pabst', is written over a horizontal line.

Wilfried Pabst

(b) (6)

9-19-2014

(b) (6)

PAY to the order of US First Auto Wildlife Service \$ 100.00

One Hundred Dollars 100 Dollars

PlainsCapitalBank

www.plainscapital.com  
San Antonio, TX 78216

For CITES Permits

[Signature]

MP

COLONY CLASSIC



Department of Interior  
U.S. Fish and Wildlife Service

# Federal Fish and Wildlife Permit Application Form

RCUD MAY 10 2018

LB

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 of Southern  
African Leopard and Namibian Southern White  
Rhinoceros

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 Bastien	1.b. First Name Thomas	1.c. Middle Name Initial (b) (6)	1.d. Suffix
(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

(b) (6) to #, or Room #; no P.O. Boxes)				
1.b. City Yuma	1.c. State AZ	1.d. Zip code/Postal code (b) (6)	1.f. Country 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.	
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)	
Thomas Bastien	4/23/18
Please continue to next page	

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND  
NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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 ( ) and return your original permit with that form.

**Note 3:** *Sport-hunted trophy* is defined at 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 4:** Certain hunting trophies, including leopard 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.

- Complete all questions on the application.
- Mark questions that are not applicable with "N/A".
- If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.
- 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.

Tom Bastien

(b) (6)

Yuma, AZ (b) (6)

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

Tom Bastien

(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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

a. Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20.

b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia  
Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).

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 ANIMAL HAS ALREADY BEEN TAKEN, please enter the following:

d. 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, Khomas, Hochland Mountains  
Borodino # 179

e. Date wildlife is to be hunted:

N/A 11/14/2017

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

Alpha Pride Safaris Christo van der Venster +  
Namibia Safari Corp

- g. 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]:

Namibia

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.

- a. 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: JG Van der Merwe  
Business Name: Namibia Safari Corp  
Address: Farm Borodino # 179  
Address: PO Box 336  
City: Windhoek  
State/Province: Windhoek 9000  
Country, Postal Code: Namibia

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. 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: \_\_\_\_\_



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.

***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.***

Page 5 of 7

# MINISTRY OF ENVIRONMENT AND TOURISM

Directorate Natural Resources Management  
Private Bag 13308  
Windhoek, Namibia  
Enquiries: Chief Warden,  
Permit Office



Tel: +264-61-284 2111  
Fax: +264-61-258 861

PERMIT No.:

175849

VALID FROM:

16/11/2017

VALID TO:

30/11/2017

RECEIPT No.:

02171263

## PERMIT TO HUNT FOR TROPHIES

Permission is hereby granted in terms of the Nature Conservation Ordinance 1975 (Ord. 4 of 1975)

Name of Trophy Hunter: Thomas (b) (6) Bastien

Residential Address: (b) (6) Yoma, Arizona

Country: U.S.A.

To hunt the specified number of game for the sake of trophies:

Indicates species listed on CITES  
Appendix I or II

SPECIES: COMMON NAME	Number
Buffalo	
<del>SPEC I</del> Crocodile	
Dik-dik	
Eland	
<del>SPEC II</del> Elephant	
Giraffe	
Grey Duiker	
<del>SPEC II</del> Hippopotamus	
Impala. Black-faced	
Impala. common	
Klipspringer	
Kudu	
<del>SPEC II</del> Lechwe	
Oryx (Gemsbok)	
Ostrich	
Red hartebeest	
Reedbuck	
<del>SPEC I</del> Rhinoceros, black	
<del>SPEC I</del> Rhinoceros, white	
Roan	
Sable	
Springbok	

SPECIES: COMMON NAME	Number
Steenbok	
Warthog	
Waterbuck	
Wildebeest, blue	
Zebra, Burchell's	
<del>SPEC II</del> Zebra, Hartman's mountain	
Blesbok	
Wildebeest, black	
<del>SPEC I</del> Cheetah	
<del>SPEC I</del> Leopard (Male)	1x
<del>SPEC II</del> Lion	
Other	
* Subject to the attached predator trophy hunting conditions.	
* Notify nearest MET 7 days prior hunt.	
-081 2525717	

on the following farms / hunting concessions: Borodino #179

Guided by (name of guides): J.S. Van der Merwe

MINISTRY OF ENVIRONMENT & TOURISM

Eli's Merkel E. Merkel  
ISSUING OFFICER (NAME & SIGNATURE)

UNDER THE AUTHORITY OF THE MINISTER,  
POHAMBA SHIFETA IN TERMS OF SECTION  
78 (L) OF THE NATURE CONSERVATION  
ORDINANCE, 1975 (ORDINANCE NO. 4  
OF 1975) AS AMENDED.

IMPORTANT: This permit is not valid if altered in anyway

1566

Official MET date stamp

MINISTRY OF ENVIRONMENT  
AND TOURISM  
REPUBLIC OF NAMIBIA

2017 -11- 13

WINDHOEK PERMIT OFFICE  
Private Bag 13308, Windhoek  
Tel: 2842111 Fax: 250661

**The following certificate must be completed immediately after each animal that has been hunted (please print)**

The following certificate must be completed immediately after each animal that has been hunted (predator)														
Date	Species	LH*	RH*	LB*	RB*	Total	RW*	Age	Male/ Female	Farm		Signatures		
										Name	No	Farm owner	Hunter	Professional hunter Master hunting guide Hunting guide
30/11/2017	Leopard							15	m	Barodino	175	<i>[Signature]</i>	<i>[Signature]</i>	<i>[Signature]</i>
<p>We hereby individually and collectively declare that the <del>predator</del> predator recorded and photographed was hunted, shot and killed by us in full accordance with all the predator trophy hunting permit conditions.</p> <p><i>[Signature]</i> 30/11/2017</p>														

\*L= Left, R=Right, Horn, B=Base, RW=Rowland Ward

\*No trophy hunter may hunt unless accompanied by a professional hunter, master hunting guide or hunting guide.

**This permit must be kept on the person of the permit holder at all times while hunting.**

Only guide(s) as specified on the permit may conduct the hunt.

I hereby acknowledge that I have read and understand the predator trophy hunting permit conditions:

Signatures:

Trophy Hunter: Tamara (b)(6) [redacted] [signature] Date: \_\_\_\_\_  
Trophy Hunting Guide: [signature] Date: 30/11/2017  
Trophy Hunting Operator: [signature] Date: 30/11/2017.  
Permit Number: 175849

MINISTRY OF ENVIRONMENT AND TOURISM REPUBLIC OF NAMIBIA
2017 -11- 13
WINDHOK PERMIT OFFICE Private Bag 13306 , Windhoek Tel: 2642111; Fax: 250851

For official use: MET date stamp.



4. Close up of the nose clearly showing the nose, eyes, and mount and a visible predator hunting quota tag number.



5. Frontal view of the teeth showing coloration and wear on the canines and incisors and visible predator hunting quota tag number..



6. Hindquarters clearly showing the scrotum and visible predator hunting quota tag number.

**Photographs required from the cleaned skull:**



7. Lower jaw showing all the teeth and chipping of the enamel ridge on the back of the canines.



8. Upper jaw showing all the teeth and chipping of the enamel ridge on the back of the canines.



9. Side view of the lower jaw (either side) showing the canine and wear on the cusps of molars and premolars.



10. Wide shot of all the teeth showing wear, broken teeth, and teeth coloration.

SIGNATURE OF:

Trophy hunter:

*Tom Radtke*

Date:

*30/11/2017*

Trophy hunting Guide:

*JS v/d Mene*

Date:

*30/11/2017*

Trophy hunting Operator:

*JS v/d Mene*

Date:

*30/11/2017*

**IF TROPHY WAS TAKEN:**

10. DATE TROPHY TAKEN: 29/11/2017

11. GPS LOCATION (In decimal degrees):

12. CONDITION OF PREDATOR (tick all appropriate boxes):

- i) HEALTHY ☒ ii) UNHEALTHY ☒ iii) FULL STOMACH ☐ iv) MEDIUM STOMACH ☐  
v) EMPTY STOMACH ☐

**MEASUREMENTS:**

13. BODY LENGTH (CM): 223

14. SHOULDER HEIGHT (CM):

15. NECK CIRCUMFERENCE (CM):

16. SKULL LENGTH (MM):

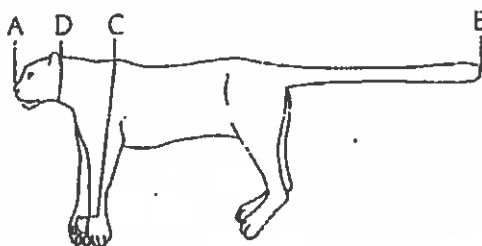
17. SKULL WIDTH (MM):

18. WEIGHT (KG) 7.7

**MEASUREMENTS & PHOTOGRAPHS**

**Measurements to be taken:**

11. Body length (cm, tip of nose to tip of tail; Measurement A-B)
12. Shoulder height (cm, tip of scapula to back of plantar pad; Measurement C)
13. Neck circumference (cm, immediately behind the ear; Measurement D)
14. Skull length (mm, greatest length of skull, measured as a straight line between pegs)
15. Skull width (mm, greatest width of skull, measured across zygomatic arches)



**Photographs required before the trophy is skinned:**



1. Side view showing the entire body with the hunter positioned directly behind for scale, and visible predator hunting quota tag number.

2. The predator lying on its right showing the feet and visible predator hunting quota tag number.

3. The predator lying on its left showing the feet and visible predator hunting quota tag number.



# SCHEDULE G

## RECORD SHEET (Regulation 114C (o))

### Schedule G -- RECORD SHEET (Regulation 114C (o))

SPECIES HUNTED Leopard

HUNT PERMIT NUMBER 175849 CLIENT NAME Thomas Baskin

PROFESSIONAL HUNTER JS van der Merwe HUNTING OUTFITTER Mamibia Safari Corp.

HUNTING BLOCK/PROPERTY NAME Baroching CONCESSION HOLDER/LANDOWNER JS v/d Merwe

HUNT START DATE 16/11/2017 HUNT FINISH DATE 30/11/2017

1. WAS THE HUNT SUCCESSFUL? ☒ YES ☐ NO

IF NO, WHY NOT?

2. HUNTING METHOD (tick appropriate box): i) BAIT AND BLIND ☒ ii) ON FOOT ☐

3. PRE-BAITING: ☒ YES ☐ NO

4. NUMBER OF BAIT SITES USED DURING HUNT (including pre-baiting if applicable): 12

5. NUMBER OF BAIT SITES FED ON BY PREDATOR (including pre-baiting if applicable): 4

6. TOTAL NUMBER OF BAIT NIGHTS (including pre-baiting if applicable):  
The total number of nights that all bait sites were open (if 6 bait sites were open for 1 night = 6 bait nights) 22

7. TOTAL NUMBER OF BAITS USED (including pre-baiting if applicable):  
The total number of times that bait sites were 'freshened' with new bait 12

8.

SEX & AGE OF PREDATOR FEEDING ON BAITS DURING HUNT:	NUMBER:	EVIDENCE (SIGHTING, TRACKS, TRAIL CAMERA):
Adult male	<u>3</u>	<u>1</u>
Adult female	<u>4</u>	<u>1</u>
Subadult male	<u>1</u>	
Subadult female	<u>2</u>	
Juvenile	<u>1</u>	
Unknown	<u>0</u>	

9. NUMBER OF PREDATOR SEEN MORE THAN 1 KM AWAY FROM BAITS: 2

282111107 NEW 01/08 8810004306

HOLD DOCUMENT UP TO THE LIGHT TO VIEW TRUE WATERMARK

**CHASE** 

**CASHIER'S CHECK**

HOLD DOCUMENT UP TO THE LIGHT TO VIEW TRUE WATERMARK

Date 04/27/2018

(b) (6)

(b) (6)

Pay to the order of: **STEFAN WIEDERL**

Order Of:

Pay: ONE HUNDRED DOLLARS AND 00 CENTS

\$\*\* 100.00 \*\*

Do not write outside this box

Memo: \_\_\_\_\_

Note: For information only. Comment has no effect on bank's payment.

Drawer: **JPMORGAN CHASE BANK, N.A.**



Ryan A. Crowley, Managing Director  
JPMorgan Chase Bank, N.A.  
Phoenix, AZ



(b) (6)



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

OMB No. 1018-0164  
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

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

Type of Activity:

Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros

RCVD JAN 11 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 BOYER	1.b. First name MATTHEW	1.c. Middle name/initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Occupation (b) (6)	4. Affiliation/Doing business as (see instructions) (b) (6)	
5. Signature (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 P.O. Box) (b) (6)					
1.b. City WARNER	1.c. State NH	1.d. Zip code/Postal code (b) (6)	1.e. Country/Province	1.f. Country USA	
2.a. Mailing Address (include if different than physical address; include name of) (b) (6)					
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. Country/Province	2.f. Country	

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  (b) (6) Signature of applicant/person responsible for permit (No photocopied or stamped signatures) _____ Date of signature (mm/dd/yyyy) 11-20-2017

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: ZIMBABWE, DANDE NORTH SAFARI AREA, MATOMO CAMP
- b. Date wildlife was hunted: MAY 13TH 2017 - MAY 31ST 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, 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 document]:

ZIMBABWE DIP + PACK WITH ANDY HUNTER  
8 RIVONDA DRIVE  
MOUNT PLEASANT, HARARE, 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 appear on the face of the export permit].

Name: Business CHARLTON MCCALLUM SAFARIS  
Name: Address: 15 A YELLOW WOOD LANE  
Address: KAMBANJI HARARE  
City:  
State/Province:  
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: \_\_\_\_\_ Date: 11-20-17

*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.*

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 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):

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):

MATTHEW (b) (6) BOYEN  
(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.



CASH ONLY IF ALL CheckLock™ SECURITY FEATURES LISTED ON BACK INDICATE NO TAMPERING OR COPYING



(b) (6)

(b) (6)

(b) (6)

1/5/2018

PAY TO THE ORDER OF US Fish and Wildlife Service

\$ \*\*100.00

One Hundred and 00/100\*\*\*\*\*



US Fish and Wildlife Service

PROTECTED AGAINST FRAUD

DOLLARS

MEMO

(b) (6)

Details on Back

Intuitive CheckLock™ Secure Check

### 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\_\_\_\_ 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: \_\_\_\_\_

*Stan S Studer* (b) (6) (b) (6)

Name: \_Stan S Studer\_ (b) (6)

Date: \_May 8, 2018\_



# 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



# Namibia



## ESTIMATED TOTAL ELEPHANTS

**22,754 ± 4,305**

## QUESTIONS

**90 - 90**

## GENERAL STATISTICS

Country Area	825,418 km <sup>2</sup>
Range Area	164,069 km <sup>2</sup> (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  $\pm$  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<sup>2</sup>, 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  $\pm$  3,580, 9,165  $\pm$  2,016, 14,097  $\pm$  2,678 and 13,116  $\pm$  3,413 (Chase, 2007; Craig & Gibson, 2013b, 2014; Craig, 2011b; Gibson & Craig, 2015a). The previous estimate in the AESR 2007 was 8,725  $\pm$  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 $\ne$ 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  $\pm$  1,940, 3,638  $\pm$  1,164, and 6,413  $\pm$  2,566 (Craig & Gibson, 2013a; Gibson & Craig, 2015b; MET, 2012). The 2015 figure replaces an estimate of 3,758  $\pm$  2,289 for Khaudum, 61  $\pm$  115 for N $\ne$ a Jaqna (Kolberg, 2004) and 967  $\pm$  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 Ukwuagali 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).



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  $3,378 \pm 1,756$  and 2,810 (confidence limits not available) (Kolberg, 2012; MET, 2012). The most recent **aerial sample count** from 2015 gave an estimate of  $2,911 \pm 637$  (Kilian, 2015) and replaces an estimate of  $2,057 \pm 598$  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  $314 \pm 154$  (MET, 2012). This replaces an estimate of  $210 \pm 157$  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 Houanib and Houarusib 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% CL	FROM	TO	PERCENT (%)	AREA (km <sup>2</sup> )
Aerial Sample Counts	22,754	4,306	—	—	42 %	68,121
Informed Guesses	0	—	90	90	10 %	16,162
<b>Totals 2015</b>	<b>22,754</b>	<b>4,305</b>	<b>90</b>	<b>90</b>		
<b>Totals 2006</b>	<b>15,807</b>	<b>3,276</b>	<b>20</b>	<b>20</b>		
Assessed Range					52 %	84,283
Unassessed Range					48 %	79,786
<b>Total Range</b>					<b>100 %</b>	<b>164,069</b>

## 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 (km <sup>2</sup> )
Repeat Survey	+6,947	±5,410	0	0	50 %	81,727
New Guess	0	0	+70	+70	2 %	2,556
<b>Totals</b>	<b>+6,947</b>	<b>±5,410</b>	<b>+70</b>	<b>+70</b>	<b>52 %</b>	<b>84,283</b>

## AREA OF RANGE COVERED BY EACH DATA CATEGORY

DATA CATEGORY	KNOWN RANGE (km <sup>2</sup> )	POSSIBLE RANGE (km <sup>2</sup> )	TOTAL RANGE (km <sup>2</sup> )
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
<b>Totals</b>	<b>112,471</b>	<b>51,598</b>	<b>164,069</b>

## ELEPHANT ESTIMATES

INPUT ZONE	REASON FOR CHANGE	SURVEY DETAILS			# OF ELEPHANTS		SOURCE	PFS	AREA (km <sup>2</sup> )	MAP LOCATION	
		TYPE	RELIAB.	YEAR	ESTIMATE	± 95% CL				LONG	LAT.
Etosha National Park	RS	AS	B	2015	2,911	637	Kilan, 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	MEI, 2012	1	40,887	14.1°E	20.0°S
Mangochi Area	NG	O	D	2015	90		Lindtjerk, 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, 2015a	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

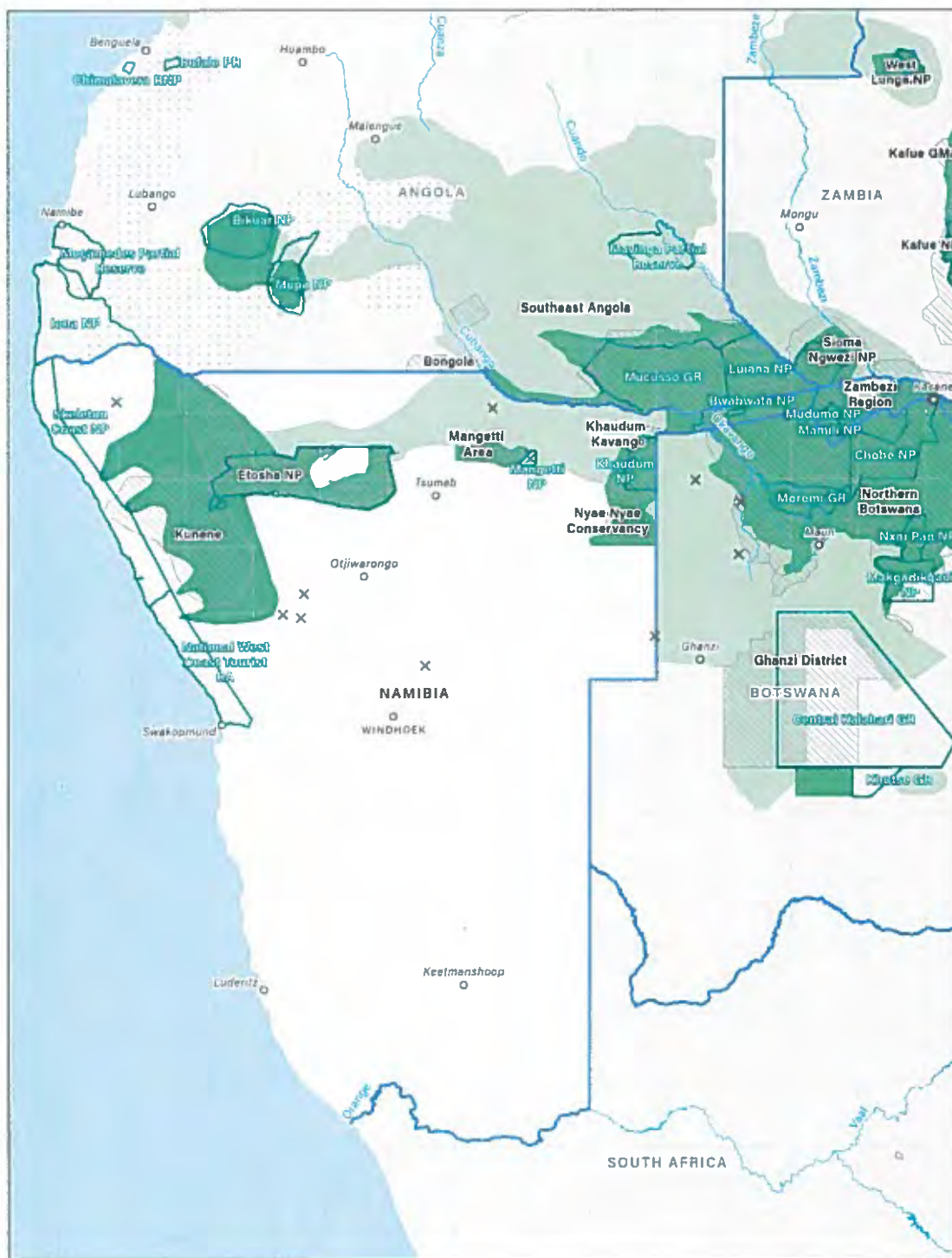
## PFS

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.

## 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).

# Namibia



0 90 180 270 360 450 540 km

## ABBREVIATIONS AND ACRONYMS

See Appendix 18 for map abbreviations and acronyms



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AFRICAN ELEPHANT STATUS REPORT 2016



- |                   |                       |
|-------------------|-----------------------|
| — Intl Boundaries | <b>ELEPHANT RANGE</b> |
| — Rivers & Lakes  | Known                 |
| ● Towns           | Possible              |
| □ Protected Areas | Doubtful              |
| □ Input Zones     | X Sighting            |

NAMIBIA



RCVD JUN 14 2018 LP

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

Type of Activity

U.S. Fish and Wildlife Service  
Division of Management Authority  
Branch of Permits, MS 1A  
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 <b>Studer</b>	1.b. First Name <b>Stanley</b>	1.c. Middle Name/Initial <b>(b) (6)</b>	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address

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

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

**Section C: All applicants complete address information**

1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes) <b>(b) (6)</b>				
1.b. City <b>San Antonio</b>	1.c. State <b>TX</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>
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) <b>Stan Studer</b> <b>(b) (6)</b> <b>06/08/2018</b>
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:

Namibia, Bwabwata West National Park, S 18 09' C 162 E 021 42'C 495, Caprivi Area, Rundu Town

b. Date wildlife is to be hunted:

July 1st to July 21st, 2018

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

Hunt Africa Namibia, Professional Hunter: Jacobus Hugo Pienaar (Senior)  
PO Box 1100 Gobabis Omaheke Namibia, Farm Hester 407, Gobabis, Namibia

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). 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: Mr. Louw Nel  
Business Name: Tropaendienste Taxidermy  
Address: PO Box 21068, Windhoek, Namibia  
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?

Population growth of herds up to 500 at a time. Last game count was in Oct 2017 and estimated resident elephant in the area of more than 2000

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?

40% of the trophy fees go to the Namibia government to the Game Products Trust Fund.  
The funds are used for repairs, maintenance and salaries for government game rangers in areas where there are Elephant roaming. Another 40% go to the community that is used to pay game guards and for the uplifting of the KWE people.

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 outfitter pays informers in the area to help with anti poaching activities.

The outfitter / Professional Hunter is a trustee on HUAP (Hunters United Against Poaching) Trust

**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: Stan Shale (b) (6) \_\_\_\_\_ Date: 6/11/18

*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  
Operator Enhancement Questionnaire**

v.5/8/18

1. Name of area operator: Huntafrica Namibia Safaris
  - a. Years in business: 31 years
  - b. Name of company conducting hunt: Huntafrica Namibia Safaris
2. Name of concession: Bwabwata West National park                      Size in km<sup>2</sup>: 3800
  - a. Land tenure: Government lease
  - b. Length of concession agreement: 5 years                      Can it be renewed?    Yes
  - 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:
    1. Yes, Annual Reporting: Detailed report to the Ministry of Environment and Tourism of each client and every animal that was hunted.
  2. Poaching control. Yes. By the government as well as the Namibia Defense force and the community rangers
  3. Community employment – all staff employed out of the community
  4. Training - the operator provide training in different fields. Eg -drivers, teachers, computer courses, building of training center etc.
  - d. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: Rundu (bigger town) Divundu( very small town)
  - e. If the concession borders a national park, please provide the park name: Inside the Bwabwata National Park
  - f. Description of general and distinctive habitat features and any water features:  
Bushveld . The Okavango River forms the Western border.
3. Are there any communities living in the concession?    Yes
  - a. If so, estimated number of people or villages in the concession? One village Omega 1000 people
4. Are there communities bordering this concession?    Yes
  - a. If so, estimated number of people or villages around the concession? Muchiko area 500

**Conservation Force  
Operator Enhancement Questionnaire**

v.5/8/18

5. Relevant game populations in the concession:<sup>1</sup>

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/down/ stable)	How monitored?
Elephant	Dense 2500		Stable	By counts
Lion	Sparse		Up	
Leopard	Dense		Stable	
Prey species	Buffalo, Sable, Roan, Kudu, Impala, Warthog, Waterbuck, Reedbuck, Buschbuck & Duiker			

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	
Trackers	11	11
Anti-poaching scouts/rangers	20	20
Other anti-poaching	NDF	
Cooks/housekeepers	4	4
Community coordinators	2	2
Managers	1	
Biologists	1	
Others: _____		

7. Number of staff employed in the off-season: 11

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	Full staff		
Managers	1		
Maintenance	0		
Road opening/construction	30 people		
Community relations personnel	1		
Others: _____			

8. Anti-poaching efforts:<sup>2</sup>

<sup>1</sup> 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?"

**Conservation Force  
Operator Enhancement Questionnaire**

v.5/8/18

- a. Number of anti-poaching staff: \_\_\_\_\_
- 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: \_\_\_\_\_
- e. Description of anti-poaching equipment, vehicles, etc.: \_\_\_\_\_
- f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? \_\_\_\_\_ Ministry of Environment \_\_\_\_\_
- g. Do you offer rewards to poaching informants leading to arrest?   \_\_\_ Yes   \_\_\_
- h. Do you offer rewards to poaching informants upon conviction?   \_\_\_ No
- i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in?   \_\_\_ Nam Dollar \_\_\_\_\_

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts	31200	31200	31200	
Equipment				
Vehicles	4x4 vehicle	"		
Petrol	As needed			
Rewards paid				For each person that is arrested the informer receives N\$5000 per case
Other: _____				
Other: _____				
<b>TOTALS</b>				

**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				

<sup>2</sup> 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**

v.5/8/18

Boats/nets confiscated				
Tusks recovered				
Carcasses observed				
Other: _____				

**10. Community investment:<sup>3</sup>**

- a. Does the company contribute money or goods/services to local communities? ☐ Yes
- b. If so, what percentage or amount is shared, how often, and why 2 Miljlon Nam Dollars (e.g., required by law, required by contract, voluntary contribution)?

Part of the contract and voluntary \_\_\_\_\_

- 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: 45 ton meat distributed by the community themselves \_\_\_\_\_
- 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. \_\_\_\_\_ NOT \_\_\_\_\_
- f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? ☐ Not Applicable in the Park \_\_\_\_\_

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? \_\_\_\_\_

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)	80,000	95,000	110,000	
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)	-			
Health (e.g., medical	-			

<sup>3</sup> 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."



**Conservation Force  
Operator Enhancement Questionnaire**

v.5/8/18

salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water Infrastructure Improvements	1.Borehole and water installation Value : N\$ 40,000			
Sports teams funded	11 teams funded every year and a big tournament Value N\$90,000/year			
Construction materials donated	N\$500,000			
Other: _____				
Other: _____				
<b>TOTALS</b>				

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	6 100%	6 100%	6 100%
-- hunting leopard	2 100%	2 100%	2 100%

12. Dollar amount and percentage of the company's revenue from U.S. clients: 90 %

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 - by Ministry of Environment and Tourism, restocking - through Natural breeding), management activities, Research - by Ministry of Environment and Tourism.

14. I declare that the foregoing is true and correct.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_ Title: \_\_\_\_\_

**Conservation Force  
Operator Enhancement Questionnaire**

v.5/8/18

salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements	1.Borehole and water installation Vaulue : N\$ 40,000			
Sports teams funded	11 teams funded every year and a big tournament Vulue N\$90,000/year N\$500,000			
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	6 100%	6 100%	6 100%
-- hunting leopard	2 100%	2 100%	2 100%

12. Dollar amount and percentage of the company's revenue from U.S. clients: 90 %

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 - by Ministry of Enviornment and Tourismn , restocking - through Natural breeding ), management activities, Research - by Ministry of Enviornment and Tourism.

14. I declare that the foregoing is true and correct.

Signature: 

Name: JAMES W. CAAAM Title: CO-OWNER OF CONCESSION

(b) (6)

32-61/1110 (b) (6)

DATE 6/8/18

PAY TO THE ORDER OF US Fish & Wildlife Service \$100.00  
one hundred even

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

MEMO Stan Elephant Stan Studer

(b) (6)  
(b) (6),

DOLLARS

MP

# 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 9, 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 12 2018

13

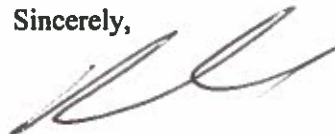
Re: Application for Import of a Sport-Hunted Lion Trophy

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

## 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](mailto:cf@conservationforce.org)

Signed: \_\_\_\_\_

Name: \_\_\_\_\_

Date: \_\_\_\_\_

(b) (6)  
Mance (b) (6) Park  
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: 1A  
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 2013

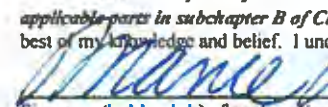
LB

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

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

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution 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 Huntsville	1.c. State TX	1.d. Zip code/Postal code (b) (6)	1.e. County/Province (b) (6)
1.f. Country USA			
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) (b) (6)			
2.b. City Huntsville	2.c. State TX	2.d. Zip code/Postal code (b) (6)	2.e. County/Province (b) (6)
2.f. Country 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 <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input type="checkbox"/>
3	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that I am subject 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) 02/06/2013

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  
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: \_\_\_\_\_

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 ANDREW BARRY NRC/Passport No (b) (6)

Safari Company on behalf of which the Professional hunter is submitting this return PEKSTONE

## DETAILS OF CLIENT

Full Name MICHAEL PARK NRC/Passport No (b) (6)

Postal Address:

Non Resident Hunting Licence No. 23680

Date of issue 24/5/17

Name of Hunting block hunting was conducted LUNDU

Hunting period: 17/6/17

to 10/7/17

GMA

Date	Species/Sex	Number Killed	Number wounded	GPS Location	Trophy for Export		Foreign currency value charged to client
					Yes	No	
20/6	HIPPO M	1	11 27 02S	032 41 208	✓		
23/6	LION M	1	11 15 02S	032 49 920	✓		
26/6	LION M	1	11 09 101	032 35 443	✓		
28/6	IMPALA M	1	11 25 094	032 42 228		X	

## DETAILS OF TROPHY MEASUREMENT

Species	Length of skin	Length of Tusk	Av. Length of Horn
HIPPO		55cm	
LION	SKULL	24 x 16 cm	
LION	SKULL	36 x 26 cm	
IMPALA		43 cm	

## 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		
Amount of foreign currency paid by the Safari Co. on behalf of the client to the DG for license, 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 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 amount paid by the client for the hunt

Date:

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



# 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 Langa 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



*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.*

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.

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, interspersing 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 second 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 an 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 as 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 Kalindu who is to be commended for their desire to realize incomes from both their land and 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 Ka'indu Natural Resources Trust has pursued this project since 2005. The model was initially supported by DANIDA and GRZ as Ka'indu 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 Ka'indu 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 Ka'indu 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



THIS DOCUMENT CONTAINS A TRUE INTERLEUK - HOLD UP TO LIGHT TO REVEAL

**WESTERN UNION** **WU**  
issuing money order service

**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)

\$ 100.00

PAY EXACTLY ONE HUNDRED DOLLARS AND NO CENTS  
PAY TO THE ORDER OF US FWS

PURCHASER'S ADDRESS

PAYMENT OF ACCT

(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-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 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 17<sup>th</sup> 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<sup>2</sup> of wildlife area (average 189 km<sup>2</sup> 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<sup>2</sup> (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<sup>2</sup> (approximately 10,000 km<sup>2</sup> 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<sup>2</sup> (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 of 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 unsustainable 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 and 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 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 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 undertaken 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 Coglianor, Chief  
Branch of Permits  
Division of Management Authority

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**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 Coglian*  
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. 1018-0164  
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

RCVD MAR 12 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 of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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 <b>PISHKO</b>	1.b. First name <b>JOHN</b>	1.c. Middle name or initial <b>(b) (6)</b>	1.d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Occupation <b>(b) (6)</b>		
4. Affiliation/ Doing business as (see instructions)			
5.a. Telephone number <b>(b) (6)</b>	5.b. Alternate telephone number	5.c. Fax number	5.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		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>(b) (6)</b>				
1.b. City <b>EXPORT</b>	1.c. State <b>PA</b>	1.d. Zip code/Postal code: <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter 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 understanding and that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <b>(b) (6)</b> <b>March 9, 2018</b> Signature of applicant _____ Date of signature (mm/dd/yyyy) Signature of applicant responsible for permit (No photocopied or stamped signatures)	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: 0 (Import is limited to two per hunter per calendar year)  
**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: 0 (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild:
- b. Date wildlife was hunted: (a) NIASA GAME RESERVE, BLOCK L2, S12.73382/E36.76317, MOZAMBIQ  
(b) OCTOBER 30, 2017
- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):

SKULL, FULL SKIN

- 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 Textafrica, Bairro Da Soalpo, Chimoio, Mozambique  
Tel +258 251 24661 - Fax +258 251 24657 - mozinfo@emiac.com

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 appear on the face of the export permit].

Name: Business JONATHAN HULME  
Name: Address: JOHAN CALITZ SAFARIS  
Address: MOZAMBIQUE RUA NWAMITHIMBA, NO. 1008 MATOLA  
City:  
State/Province: NIASA  
Country, Postal Code: MOZAMBIQUE

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: \_\_\_\_\_

Date: MARCH 9, 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.*

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 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):

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 PISHKO

(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.

(b) (6)

*P*

MARCH 9, 2018  
Date

Pay to the  
Order of US FISH AND WILDLIFE SERVICE \$ 100.00

ONE HUNDRED dollars & 00/100 — Dollars  Security  
Features  
Details on  
Back

S&T BANK  
800.325.BANK

For  
(b) (6)

*Don't H.P.U.*



Department of Interior  
U.S. Fish and Wildlife Service

RCVD APR 12 2018

LB

# Federal Fish and Wildlife Permit Application Form

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

Type of Activity

Import of Sport-hunted Trophies of Southern  
African Leopard and Namibian Southern White  
Rhinoceros

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 <b>Smith</b>	1 b. First Name <b>Randall</b>	(b) (6)	Initial	1 d. Suffix
2 Date of Birth (mm/dd/yyyy) (b) (6)	3 Telephone Number	3 a. Alternate Telephone Number	4. E-mail address	

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

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

## Section C: All applicants complete address information

1 a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)				
1 b. City/State/Zip code <b>Arhol Idaho</b>		1 c. Country <b>U.S.A.</b>		1 d. Country
2 a. Mailing address (include if different than physical address. Include name of company or organization 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) <b>Randall Smith</b> <b>04/10/2018</b>	
Please continue to next page	

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** *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 4:** Certain hunting trophies, including leopard 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.

- Complete all questions on the application.
- Mark questions that are not applicable with "N/A".
- If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.
- 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.

Randall Smith / NorthCar Inc.

(b) (6)

Hayden Idaho

(b) (6)

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

Randall Smith

(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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

- a. Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20. (1) LEOPARD SKIN & SKULL
- b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity:      (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).

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 ANIMAL HAS ALREADY BEEN TAKEN, please enter the following:

- d. 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 - Zumbo, TETE

- e. Date wildlife is to be hunted:

06/30/17



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

*Russell Louemore - Chawalo Safaris  
Zumbo, TETE Mozambique*

- g. 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 Textafalca, Bairro Da Soalpo, Chimio, Mozambique  
TEL +258 251 24661 - Fax +258 251 24657 - mozinfo@emiac.co.mz*

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.
- a. 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: *RUSSELL LOUEMORE*  
Business Name: *CHAWALO SAFARIS*  
Address: *CHAWALO SAFARI LODGE*  
Address:  
City: *Zumbo*  
State/Province: *TETE*  
Country, Postal Code: *Mozambique*

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. 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.

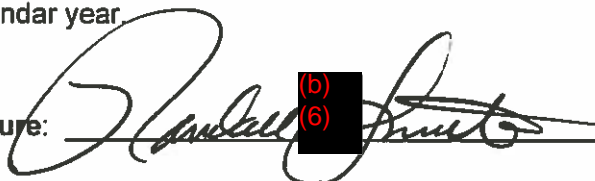
I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying 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: *N/A* Date: \_\_\_\_\_

10. 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: \_\_\_\_\_

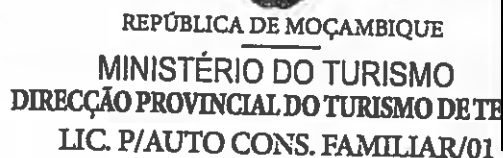
 (b) (6)

Date: 04/10/2018

*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.*

11. 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)



**LICENÇA DE CAÇA M/A**  
Artº 57º de Decreto nº 12/02

Nome **Randal** **(b) (6)** **Smith**  
 Nacionalidade **Americano**  
 Residência **América**  
 Idade **59** anos Sexo **Masculino**

Para a área de Chawalo Safaris

Data de emissão 28 / 04 / 2017

Valido até 30 / 11

Taxa Paga 888,72Mt



## TRANSGRESSÕES

Data	Transgressões	Multa	Rúbrica

## A FAUNA BRAVIA É UM RECURSO NATURAL VALIOSA DO PAÍS

### REGISTO DOS ANIMAIS ABATIDOS E ANOTAÇÕES DA FISCALIZAÇÃO

[illegible]

## O CAÇADOR DEVE SER UM AGENTE FISCALIZADOR

O CAÇADOR DEVE CONHECER TODAS AS LEIS DE CAÇA

A FAUNA BRAVIA DEVE SER UTILIZADA RACIONALMENTE.

(b) (6)

(b) (6)

4-11-2018

Pay to the  
Order of

US Fish + Wildlife

\$ 100.00

One hundred dollars & no/100

Dollars



Security  
Features  
Circle on  
Back

BANK OF AMERICA  
357 W CANFIELD AVE  
COEUR D'ALENE ID 83815

For

Import permit

Rene D. Smith

MP

(b) (6)

© Courtney Corbett

## MAIL ROOM ROUTING SLIP

### Section 1 - To be completed by mail room staff only.

Type: ☐ E-26    ☐ E-27    ☐ E-33    ☐ Brief    ☐ MTRco/Rec  
☐ Congressional    ☐ Extension    ☐ Other

Team: ☐ PCM    ☐ East    ☐ West    ☐ Motions \_\_\_\_\_

☐ Kim J. (DD Visa)    ☐ Hanna (Circuit/District/Federal Court)

☐ John (Pro Bono)    ☐ Subha (Attorney Discipline & Protective Order Cases)

☐ Rebecca/Lacie    ☐ Paulomi (Oral Argument & Secure Access Cases)

Cluster:    1    2    3    4    5    6

Initials: dh    Date: \_\_\_\_\_

Comments: wrong Address carrier  
has to take it back

### Section 2 - To be completed by Receiver only.

From: \_\_\_\_\_ Date: \_\_\_\_\_

Routed to: ☐ PCM    ☐ East    ☐ West    ☐ Motions

Cluster:    1    2    3    4    5    6

☐ Hanna (Circuit/District/Federal Court)    ☐ Rebecca/Lacie

☐ \_\_\_\_\_  
Name

Comments: \_\_\_\_\_

Revised 2/1/18 (wmg)

To: Mr. George D. Villavicencio, J. D.  
Supervisory Policy Specialist  
U.S. Fish & Wildlife Service - Headquarters  
Attn Division of Management Authority - Branch Of Permits  
MS: IA  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
703-358-2483 (Telephone)  
703-358-2280 (Facsimile)  
[Jorge\\_Villavicencio@fws.gov](mailto:Jorge_Villavicencio@fws.gov)

RECEIVED  
DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR  
IMMIGRATION REVIEW  
2018 APR -5 AM 11:30  
BOARD OF  
IMMIGRATION APPEALS  
OFFICE OF THE CLERK

From: Max (b) (6) Caldwell  
(b) (6)  
Lincoln NE (b) (6)  
(b) (6)

Re: Application for Importation of Namibian Sport Hunted Elephant on August 1, 2016

Date: April 3, 2018

Dear Mr. Villavicencio,

Please find my enclosed application 3-200-20 as well as my \$100 Application fee.

As noted, I harvested the bull elephant on August 1, 2016 in the Zambezi region of Namibia.

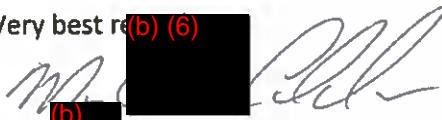
I have attached the CITES export permit from Namibia to Denmark.

My taxidermist (First Class Trophy Taxidermy) is located in Denmark but their tanning and taxidermy technicians are on Hungary. First Class Trophy has indicated that when they apply for Re-export on the CITES permit that they will ship from Hungary to Chicago USA where I will use Coppersmith.

Depending upon the timing of the tanning process I may have some of the tanned hide made into a personal gun case, belt, etc. while in Hungary. These will be indicated on Re-export CITES permit. Please let me know if you need any additional information on this topic.

Thank you very much for your attention and time.

Very best regards (b) (6)

  
Max (b) (6) Caldwell



2/2018



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

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

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

**Section C: All applicants complete address information**

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes) <b>(b) (6)</b>				
1.b. City <b>Lincoln</b>	1.c. State <b>Nebraska</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>
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. <b>(b) (6)</b>
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) <b>Max Caldwell</b> Date of signature (mm/dd/yyyy) <b>04/03/2018</b>	
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.

Page 1 address and name is OK.

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

Max (b) (6) CALDWELL  
(b) (6)  
(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.  
*Loxodonta africana* African elephant
- 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, 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:

Namibia, Wuparo Conservancy, Zambezi Region  
Nearest city is Sangwali

- b. Date wildlife was hunted:

Harvested August 1, 2016

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

Dawid Muller, Professional Hunter  
Dagga boy Hunting Safaries

- 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]:

The Elephant is currently with First Class Trophy Taxidermy in Hungary. It will be re-exported to USA from Hungary.

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 included CITES permit to export from Namibia to Denmark. Elephant was then transferred to Hungary by Taxidermist for processing.
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: First Class Trophy Taxidermy AARHUS

Address: Randersvej 397

City: Trige

State/Province:

Country, Postal Code: Denmark, 8380

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?  
During the hunt we saw between 200-500 elephants each day. Each day was different herds. Caprivi is free range, Namibian elephant numbers have risen from 7,600 in 1995 to almost 30,000 in 2018.
- 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?  
More than 50% of trophy fees go to community funds, as well as all of the meat went to community. In addition, salaries, camp monies, donations, etc. go to community from PH and hunters. Elephant hunting generated roughly 59% of all cash generated by hunting and massive amounts of meat. We saw this first hand.
- 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

Outfitter/PH provides 3 waterholes with solar installations for the community. Also installed water tanks for the whole area and villages. Transport, school fees, medical, and massive amount of anti-poaching efforts through the Namibian Professional Hunting Association. Outfitter donates hunts for anti-poaching fundraiser.



**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:  Date: 4/3/2018

*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).

My importer is Coppersmith in Chicago. I have attached contact information. I have also attached First Class Trophy Contact information.





CONVENTION ON  
INTERNATIONAL TRADE IN  
ENDANGERED SPECIES OF  
WILD FAUNA AND FLORA

PERMIT / CERTIFICATE No.

0053042  
Original

☒ EXPORT  
☐ RE-EXPORT  
☐ IMPORT

SKAT København  
16 NOV. 2017  
Helle Sørensen

2. Valid until  
13/12/2017

3. Importer (name and address)

Max (b) Caldwell  
First (c) Class Trophv  
Randersvej 397  
DK-Engle-8330

2017 02 513 871

3a. Country of import  
Denmark

5. Special conditions

Tusks no's NA 16 0078 12 90 & NA 16 0079 12 10

All imports and exports remain subject to veterinary regulations.  
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.

SKAT

DK 16. 11. 2017

5a. Purpose of the transaction (see reverse)

5b. Security stamp No.

1505820

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

7.8. *Loxodonta africana*  
African elephant

9 2x Tusks

10 W

11 2 item

11a 73/90  
(2016)

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 \*\*\*

7.8. *Loxodonta africana*  
B African elephant

9 2 ears, 8x skin panels,  
tail & trunk

10 W

11 12 item

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 \*\*\*

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 \*\*\*

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 IS ISSUED BY:

J. Shapi

Windhoek

13/08/2017

Place

Date

MINISTRY OF ENVIRONMENT  
AND TOURISM  
REPUBLIC OF NAMIBIA

13 JUN 2017

Windhoek

Security stamp, signature and official seal

14. EXPORT ENDORSEMENT:

15. Bill of Lading / Air Waybill Number:

27402027545A

Block	Quantity
A	2
B	12
C	
D	

Walv.

Port of Export / Re-export

Date

Signature

Official stamp and title

Original

Numprint: 2308



Wynand Louw

[wynand@firstclasstrophy.com](mailto:wynand@firstclasstrophy.com)

Tel +45 60223289

Skype: wynand.louw95



## FIRST CLASS TROPHY AARHUS

First Class Trophy Taxidermy AARHUS

Randersvej 397

DK - 8380 Trige

Tel: +45 70 200 850

e-mail: [aarhus@firstclasstrophy.com](mailto:aarhus@firstclasstrophy.com)

<http://www.firstclasstrophy.dk>

RECEIVED  
DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR  
IMMIGRATION REVIEW  
2010 APR -5 AM 11:30  
BOARD OF  
IMMIGRATION APPEALS  
OFFICE OF THE CLERK

*Michael R. Lewis*  
*Senior Trophy Specialist*  
[mlewis@coppersmith.com](mailto:mlewis@coppersmith.com)  
*Tel: 847-437-1500 ext: 220*  
*Fax: 847-437-1501*  
*760 Bonnie Lane*  
*Elk Grove Village, IL 60007*

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DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR  
IMMIGRATION REVIEW  
2010 APR -5 AM 11:38  
BOARD OF  
IMMIGRATION APPEALS  
OFFICE OF THE CLERK

(b) (6)

 **National Park Foundation** (b) (6)

4/3/2018  
Date

Pay to the Order of U.S. Fish AND WILDLIFE SERVICE \$ 100<sup>00</sup>  
One hundred & 00/100 Dollars

 Security Features Details on Back

**AGADIA NATIONAL PARK**

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

For 3-200-20 Permit MT (b) (6)  

(b) (6)



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

OMB Control No. 1018-0093  
Expires 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 of  
Southern African Leopard and  
Namibian Southern White Rhinoceros

RCVD MAR 14 2018

LB

Complete Sections A, 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 Cunningham	1.b. First name Samuel	1.c. Middle name or initial (b) (6)	1.d. Suffix NA
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 Amarillo	1.c. State Texas	1.d. Zip code/Postal code (b) (6)	1.e. County/Province (b) (6)	1.f. Country USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) same				
2.b. City same	2.c. State same	2.d. Zip code/Postal code same	2.e. County/Province same	2.f. Country 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 1 of Title 50. (b) (6) 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 may subject me to the criminal penalties of 18 U.S.C. 1001.
Signature of applicant/person responsible for permit (No signed or stamped signatures) <i>Samuel Cunningham</i> Date of signature (mm/dd/yyyy) 03/07/2018	

See continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit to the address on page one.**

**Note 2:** 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); (<http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 3:** *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 4:** Certain hunting trophies, including leopard 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.

**Note 5:**

- (a) Complete all questions on the application.
  - (b) Mark questions that are not applicable with "N/A".
  - (c) If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.
  - (d) 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)?
- Samuel James Cunningham scunningham@quailcreekent.com 806-282-6889
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?

a. ☒ No ☐ Yes

- b. 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):
- a. Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20.
- b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: 0 (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).
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 ANIMAL 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:
- Nyacolwe Conservancy, Eastern Province, Nyimba, and Petauke Town
- b. Date wildlife was hunted:
- August 14, 2016
- c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
- WH van Noordwyk, Ebony 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]:
- Spt. Hing Image Taxidermy, The Budger Building, 14 Uitenhag Road  
Sydenham, 6001, Port Elizabeth, RSA
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.

- a. 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 Cockcroft  
Business Name: Splitting Image Taxidermy  
Address: The Budget Building  
Address: 14 Ultenhas Road, Sydenham, 6001  
City: Port Elizabeth  
State/Province: East Cape  
Country, Postal Code: RSA

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. 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: \_\_\_\_\_

10. 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: 03/07/2018

*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.*

11. 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).


(b) (6)

Date 03/07/2018 (b) (6)

88-805/1113

PAY TO THE ORDER OF US Fish + Wild Life Service \$ 100<sup>00</sup>

One Hundred & 00/100 DOLLARS

 FirstBank  
Southwest  
Amarillo

MEMO Leopard Impact Permit Application Samuel

(b) (6)

PRINTED AMARILLO



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: 1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

Type of Activity:

Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros

RCVD MAR 14 2018

LB

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

A. Complete if applying as an individual			
1 a. Last name Lines	1 b. First name James	1 c. (b) (6) initial	1 d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions)
6 a. Telephone number (b) (6)	6 b. Alternate telephone number	6 c. Fax number	6 d. (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 Colleyville	1 c. State TX	1 d. (b) (6)	1 f. Country USA
2 a. Mailing Address (include if different than physical address, include name of contact person if applicable)			
2 b. City	2 c. State	2 d. Zip code/Postal code	2 e. County/Province
2 f. Country			

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA34431L-0 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) <u>James Lines</u> Date of signature (mm/dd/yyyy) <u>2/28/2018</u>	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**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 were 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:** The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: <sup>1</sup> \_\_\_\_\_ (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: <sup>1</sup> \_\_\_\_\_ (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: <sup>N/A</sup> \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:

- Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
- Date wildlife is to be hunted:
- Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild:

Leopard - Farm Moedhou (Kleeberg) # 112, Okahandja, Okavango, Otjozondjupa of Namibia; Elephant - Mahango National Park, Divundu, Rundu, Kavango East

- Date wildlife was hunted: June 1 - 12, 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, tusks, horn

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]:

The Yellow Shark Holdings (Pty) Ltd.  
P.O. Box 81413  
Olympia - Windhoek, Republic of Namibia

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 appear on the face of the export permit].

	Elephant	Leopard
Name:	Abiliu Hihuilepo Snr	Brink Grobler
Business Name:		
Address:	3674 Vinetta	92 Nelson Mandela Avenue
Address:		Stillwater # 5
City:		
State/Province:	Swakopmund	Klein Windhoek
Country, Postal Code:	Namibia	Namibia

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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:** James Lines **Date:** 2/28/2018

*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.*

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 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):

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 Lines

(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.



RCVD MAY 14 2018

Department of Interior  
U.S. Fish and Wildlife Service

RCVD MAY 14 2018

LE

## Federal Fish and Wildlife Permit Application Form

Type of Activity

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 703-358-2104IMPORT 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 COLLIER	1 b. First Name WILLIAM	1 c. Middle Name/Initial (b) (6)	1 d. Suffix (b) (6)
2. Date of Birth (mm/dd/yyyy) (b) (6)	3. Telephone Number	3 a. Alternate Telephone Number	4. E-mail address

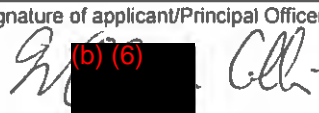
## Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

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

## Section C: All applicants complete address information

1 a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes) (b) (6)				
1 b. City Virginia Beach	1 c. State VA	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) [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)  (b) (6) 05/01/2018	
Please continue to next page	

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:

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:

Zimbabwe, Rocky Glen, Lot 3 Wedza Block – Boulder Creek, Matabeleland South.

Grid Ref: S2115-917 E29-44-682: Bubiana Wildlife Conservancy, (owner: Drummond Ranching)

P: +263 772144744, UTC+2

b. Date wildlife was hunted: ~~+263~~

06 June 2017

**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) GLS Date: 1 MAY 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).

Bubiana Conservancy, hunter's assessment. The following information was assembled through pre-hunt investigation and interviews with the property owner during the hunt.

Bubiana Conservancy is a wildlife and game conservancy consisting of approximately 55,000 acres owned by Drummond Ranching. In the late twentieth century, in cooperation with neighboring families, the Drummond family repurposed the property from commercial farming to wildlife management, restoring all but 500 acres to its natural state and laying infrastructure for drought-tolerant artificial watering holes. They reintroduced (at their own expense) all native species except Lion. The remaining 500 acres are reserved for commercial farming, producing large quantities of fresh produce for Bulawayo. The farm area is protected by high fence and gates. The remaining property is low-fenced and free-range, maintaining in cooperation with neighboring land-owners a large free-range wildlife management zone spanning multiple properties.

Bubiana specifically hosts—and this hunter personally observed or observed sign of—the full gamut of southern African plains game (from klipspringer to eland), leopard, elephant, and hyena (both spotted and the endangered brown hyena), plus a herd of cape buffalo, a small herd of hippo, multiple lakes and rivers with native fish and aquatic fauna including crocodile, and a wide assortment of bird species, including migratory birds such as doves and Egyptian geese and many species of raptors. This hunter was not pursuing leopard, but observed leopard sign daily, and observed one leopard mid-day and heard leopard calls mid-day as well as nocturnally. This hunter also observed prolific elephant spore and elephant-browsed trees (these are unmistakable) daily, and we encountered mature young bull elephant on two separate occasions while scouting for plains game.

The elephant taken was an old bull, estimated four to five decades in age, and was the only elephant harvest authorized by the land owner, Mr. Drummond, on his property that year. All trophy fees (including \$12000 USD for the elephant) were paid directly to Drummond Ranching. With the exception of national taxes, all such proceeds go to the business, which maintains the extensive watering hole system, full-time private anti-poaching patrols, full-time private game scouts, a permanent national police detachment for anti-poaching enforcement, and hospitality facilities, including lodge, staff, and guides for wildlife viewing/photography and other non-hunting activities. The Bubiana trophy management project also synergizes with the Drummonds' commercial farm. The farm employs several hundred local persons, including a large contingent who reside on the farm permanently or seasonally (specifically, safe employment and residence for a large number of local women). The farm operates on a principle of maximum self-sufficiency, harvesting as much of its material as possible from within the Drummond property for construction, maintenance, and sustainment. Portions of game animals not claimed by the client are rendered into rations and resources for the farm or are sold as material to the local artisan/curio market in Bulawayo. Our elephant provided a measured 1250 kg of edible meat to be rendered into biltong for the farm workforce. All parts of the elephant were harvested as described above, with the exception of the ribs, and entrails, and two choice long bones, which the property owner selected to leave behind to support carrion-eating species—especially spotted and brown hyena. (This was a particular surprise to the hunter, but it is not a joke. Mr. Drummond came down personally and selected the carcass parts which would be left behind for his hyena population.) All ivory has been claimed by the hunter for personal use as a family heirloom, and is awaiting export.

An appeal from this hunter: The overall profitability of any private wildlife operation also helps to placate government investors, winning patronage and staving off government land confiscation. In Zimbabwe, lands confiscated by the government are used for unethical hunting and ivory harvest or are razed and converted to agriculture which is then catastrophically mismanaged, consistently rendering the land barren within a few years. The Drummonds have already seen over 20,000 acres of their original holdings confiscated and destroyed in this manner, as have a number of their neighbors. It is worth noting that the collective of neighboring farms which allied to create the broad wildlife sanctuary described previously did so at their own expense without government directive, and now maintain it as best they can against government pressure. They are permitted to exist as long as they remain sufficiently profitable. Private operations like Drummond Ranch are the beleaguered last bastion of both wildlife conservation and efficient agriculture in Zimbabwe, until such time as significant regime change brings improved government policy. If the private game preserves fail, the wildlife will be exterminated and the people of Zimbabwe will starve.

 (b) (6)  1 MAY 18

**CERTIFICATE OF OWNERSHIP OF IVORY AND RHINOCEROS HORN**  
(Issued in terms of section 77 of the Parks and Wildlife (General) Regulations, 1990)

Cert. No 123803

Name

William

Address

COPIES CHAIRS

Texas

USA

Specified officer's signature and date-stamp

Tusk serial number

ZW 201723084

Tusk mass (kg)

16 kg

Tusk length (metric)

125 cm

Sex

M

Authority

78922

Signature of holder

Notes

1. This certificate must be returned to the Director, Department of National Parks and Wildlife Management, P.O. Box CY 140, Causeway, in the event of the tusk being cut up for manufacturing purposes, lost, stolen or exported.
2. Transfer/sale of ivory or horn is to be done at National Parks offices.

**CERTIFICATE OF OWNERSHIP OF IVORY AND RHINOCEROS HORN**  
(Issued in terms of section 77 of the Parks and Wildlife (General) Regulations, 1990)

Cert. No 123804

Name

William

Address

COPIES CHAIRS

Texas

USA

Specified officer's signature and date-stamp

Tusk serial number

ZW 201723085

Tusk mass (kg)

17 kg

Tusk length (metric)

114 cm

Sex

M

Authority

78922

Signature of holder

Notes

1. This certificate must be returned to the Director, Department of National Parks and Wildlife Management, P.O. Box CY 140, Causeway, in the event of the tusk being cut up for manufacturing purposes, lost, stolen or exported.
2. Transfer/sale of ivory or horn is to be done at National Parks offices.



(b) (6)

(b) (6)

Date

Pay to the Order of U.S. FISH & WILDLIFE SERVICE \$ 100.00  
ONE HUNDRED AND NO/100 Dollars

Look for Microprint signature line and gray border. If not present, do not cash.



**USAA FEDERAL SAVINGS BANK**  
10750 McDERMOTT FWY  
SAN ANTONIO, TEXAS 78268-0544  
(210) 456-6000 1-800-832-3724

**God Bless America**



For IMPORT PERMIT

*[Signature]*

(b) (6)

*[Signature]*

(b) (6)





## Trustmark Construction Corporation

February 14, 2018

RCVD FEB 15 2018

LB

US Fish and Wildlife Service  
DMA  
Branch of Permits, MS:IA  
5275 Leesburg Pike  
Falls Church, VA 22041-3803

To whom it may concern:

Enclosed is a check in the amount of \$100.00 for the fee to import my trophies from Southern Africa. Also, enclosed is a return FedEx envelope for the permit to be mailed back to me. If you have any questions you may reach me at (b) (6)

Thank you,



Randall (b) (6) Aldridge  
President (b) (6)

(b) (6) Florence, AL (b) (6)



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 15 2018

LB

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

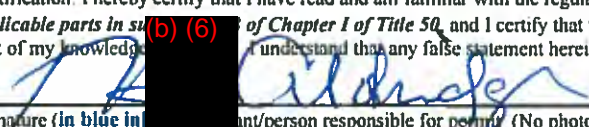
Type of Activity:  
**Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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 Aldridge	1 b. First name Randall	1 c. Middle name or initial (b) (6)	1 d. Suffix	
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions)	
(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 Florence	1 c. State Alabama	1 d. Zip code/Postal code (b) (6)	1 e. County/Province	1 f. Country USA
2 a. Mailing Address (include if different than physical address; include name of contact person if applicable) Same				
2 b. City	2 c. State	2 d. Zip code/Postal code	2 e. County/Province	2 f. Country

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

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**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 were 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:** The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: <sup>1</sup> \_\_\_\_\_ (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: <sup>0</sup> \_\_\_\_\_ (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: <sup>0</sup> \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:

- Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
- Date wildlife is to be hunted:
- Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: Near West Nicholson (Matabeleland South Province) Zimbabwe
- Date wildlife was hunted:  
June 10, 2016 through June 19, 2016

- 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 Map

- 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]:

SBS LOGISTICS PTY LIMITED , UNIT # 9 RUSTIVIA IND VILLAGE, 6 ROVER ROAD , RUSTIVIA GAUTENG 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 appear on the face of the export permit].

Name: COLLEEN STANLEY  
Business Name: SBS LOGISTICS PTY LIMITED  
Address: UNIT # 9 RUSTIVIA IND VILLAGE  
Address: 6 ROVER ROAD  
City: RUSTIVIA ,  
State/Province: GAUTENG  
Country, Postal Code: SOUTH AFRICA

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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: 2/13/18

*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.*

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 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):

Same

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):

Randall (b) Aldridge (b) (6)  
(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.

(b) (4)

(b) (4)

(b) (4)

61-118/620

2/14/2018

PAY TO THE  
ORDER OF

US Fish and Wildlife Service

\$ \*\*100.00

One Hundred and 00/100\*\*\*\*\*

DOLLARS

TRUSTMARK CONSTRUCTION CORPORATION

US Fish and Wildlife Service  
DMA/Branch of Permits, MS:IA  
5275 Leesburg Pike  
Falls Church, VA 22041-3803

(b)  
(6)

MEMO

Permit Fees For Trophies

THIS DOCUMENT CONTAINS HEAT SENSITIVE INK TOUCH OR PRESS HERE - RED IMAGE OR APPEARS WITH HEAT

(b) (4)





RCVD MAR 16 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 Lott	1.b. First Name John	1.c. Middle Name/initial (b) (6)	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) (6)

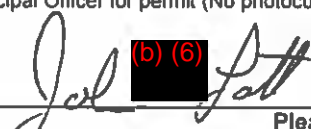
## Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

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 Aspers	1.c. State PA	1.d. Zip code/Postal code (b) (6)	1.e. County/Province	1.f. Country USA
2.a. Mailing address (include if different than physical address, include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

## Section D: All applicants MUST complete

1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount identified on page 2, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. [50 CFR 13.11(d)]
2.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50 Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)	
 (b) (6) 03/14/2018	
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 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 (b) Lott (b) (6)

)  
(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?

XXXX  
XXXX

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 African elephant

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:

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 NAMIBIA, place Dzoti Conservancy, Zambezi Region(Conservancy Office GIS coord.:S18 16'48.97"/E23 47'42.93")  
nearest city Katima Mulillo GIS coord.: S 18 19'33.45" / E 23 43'14.05"

b. Date wildlife was hunted:

September 10, 2017

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

outfitter : Ondjou Safaris cc

Professional Hunter : Barend Hendrik van Heerden

- 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]:

Postal Address: P.O. Box 21068 Windhoek, NAMIBIA

Residential address: Kapsfarm, Plot # 16, Khomas Region, NAMIBIA

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 attachments
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: Barend Hendrick van Heerden

Business Name: Ondjou Safaris cc

Address: P.O. Box 30208 Pionierspark, Windhoek, NAMIBIA / residential(office) Farm Augeigas # 34 Portion of Plot 17

City: Windhoek

State/Province: Khomas Region

Country, Postal Code: NAMIBIA

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  
regional game counts taken twice yearly. For Dzoli the first game counts were done in 2010 and ever since two per year.

The game guards have monthly patrols were game encountered are recorded and the population trend is stable. I encountered several different herds of thirty plus elephants.

- 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?  
Daily rate total USD 24,000, trophy fee elephant USD 28,000. Yes, a big portion of the funds were used for conservancy, staff, salaries, anti-poaching effort (transport, wages, etc.), drill multiple wells (waterholes) for wildlife as well for the community, supporting local schools, soccer and sports teams, and the funding of the local game guards

- 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  
yes, they made donations toward carnivore census in the region, constant support and donation towards ongoing research in the region and environmental awareness campaigns at the local schools (see pictures)

**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: NA 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: 3-14-2018

*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 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).

**The following certificate must be completed immediately after each animal that has been hunted (please print)**

[illegible]

aft, R=Right, H=Horn, B=Base, RW=Rowland Ward

ophy hunter may hunt unless accompanied by a professional hunter,, master hunting guide or hunting guide.

permit must be kept on the person of the permit-holder at all times while hunting.

guide(s) as specified on the permit may conduct the hunt.









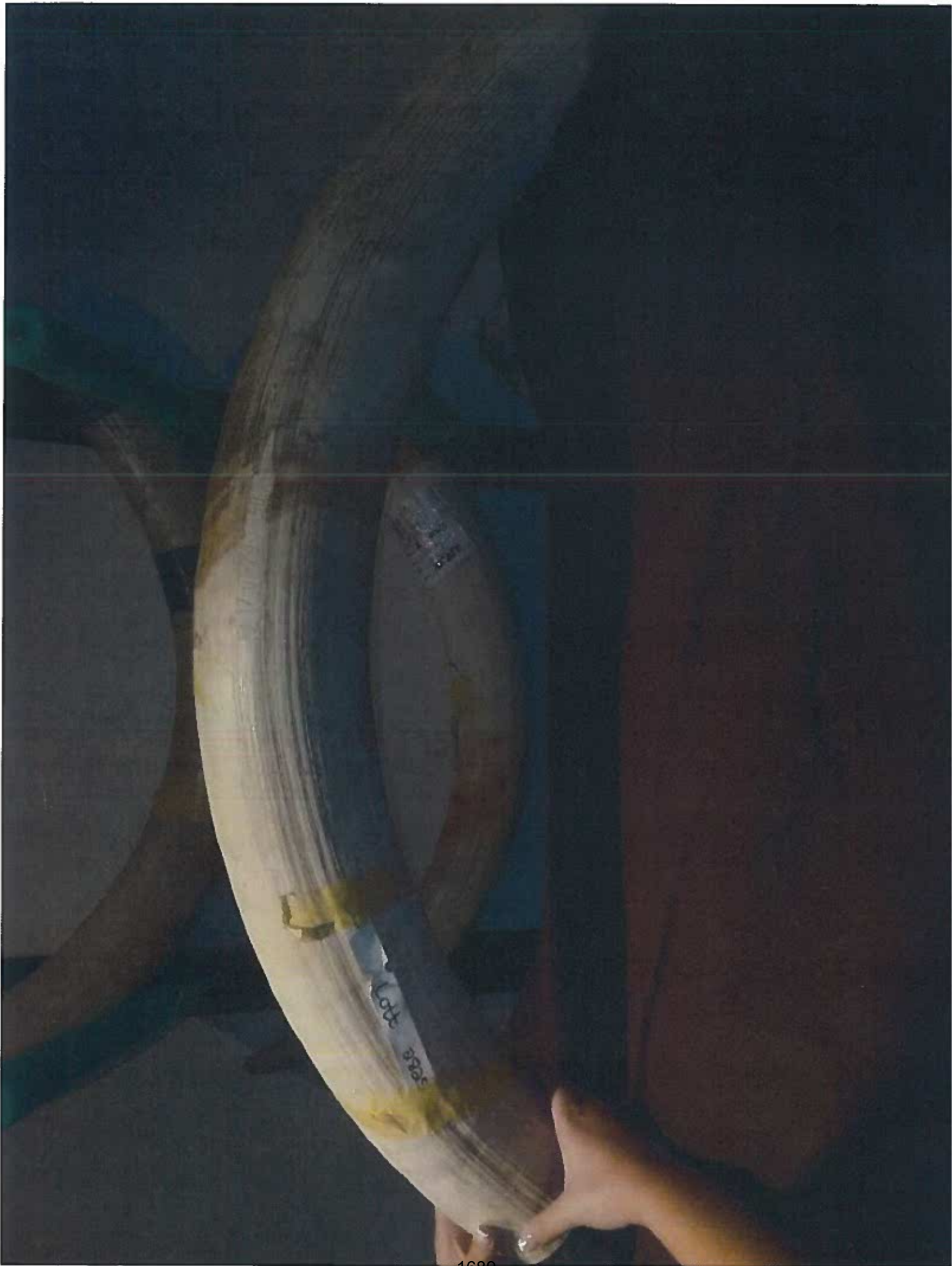














NA 17 0029 1650













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 1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

Type of Activity

RCVD APR 16 2018

Import of Sport-hunted Trophies of Southern  
African Leopard and Namibian Southern White  
Rhinoceros

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 Rogers	1.b. First Name Everett	1.c. Middle Name/Initial	1.d. Suffix
--------------------------	----------------------------	--------------------------	-------------

(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 (b) (6)			
1.b. City Lake City	1.c. State FL	1.d. Zip code/Postal code (b) (6)	1.e. Country U.S.A
2.a. Mailing address (include if different than physical address; include name of contact person)			
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. 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) Grisa Jamnik 4/9/2018

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND  
NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** *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 4:** Certain hunting trophies, including leopard 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.

- Complete all questions on the application.
- Mark questions that are not applicable with "N/A".
- If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.
- 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.

D&L COB LLC  
1500 Midway Crt. 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  
lisaj@d1chb.com  
847-690-0690

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

- a. Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20.
- b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia  
Quantity:        (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).

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 ANIMAL HAS ALREADY BEEN TAKEN, please enter the following:

- d. 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; Havalokrans 100, Outjo District

- e. Date wildlife is to be hunted:

10/14/2017



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

JJH Wassertall  
P.O. Box 1677 Academia  
Windhoek, Namibia

- g. 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]:

Reiser  
Brakwater  
Windhoek, Namibia

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.
- a. 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:  
Address:  
City:  
State/Province:  
Country, Postal Code:

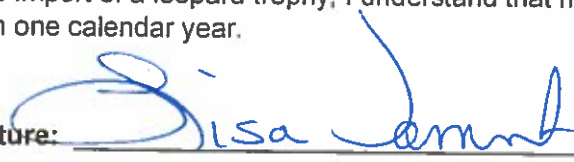
Reiser  
P.O. Box 11908  
Brakwater  
Windhoek, Namibia

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. 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: 4/9/2018

10. 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.*

11. 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

## 2165699

## 2017-10-03





Republic of Namibia

## MINISTRY OF ENVIRONMENT AND TOURISM

Tel: +264-61-284 2111  
Fax: +264-61-259101  
E-mail: [jifo.fillemon@met.gov.na](mailto:jifo.fillemon@met.gov.na); [josefina.shapi@met.gov.na](mailto:josefina.shapi@met.gov.na)

Directorate Scientific Services  
CITES Management Section  
Private Bag 13306  
WINDHOEK  
Namibia



Management Authority of Namibia

### EXPORT CONFIRMATION CERTIFICATE

THE MINISTRY OF ENVIRONMENT AND TOURISM IS THE CITES MANAGEMENT AND SCIENTIFIC AUTHORITY AND AS SUCH CERTIFIES THAT:

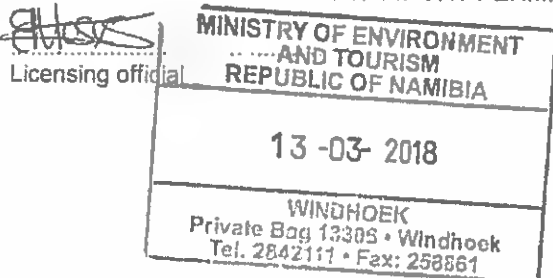
IMPORTER	EXPORTER
Everett Rogers (b) (6) Lake City FL (b) (6) U.S.A	J. N. N Wasserfall P.O. BOX 11908 Windhoek Namibia

- A) Obtained the following trophy/trophies, in accordance with the Namibian National Legislation on 14/10/2017 with hunting permit number 175089
- B) The export of this specimen(s) is not detrimental to the survival of the Namibian Leopard population

TYPE OF TROPHY
skull & fullskin

The trophy is marked with the following tag number: NAPP 77/250 (2017)

IN ACCORDANCE WITH ARTICLE III OF THE CITES CONVENTION, AN EXPORT PERMIT WILL BE ISSUED UPON RECEIPT OF AN IMPORT PERMIT FROM THE COUNTRY OF DESTINATION



Laura. Durgin @ dlchb.com

CUSTOMS POWER OF ATTORNEY

and

Acknowledgement of Terms and Conditions of Service

Copyright 1995, National Customs Brokers and Forwarders Association of America, Inc.  
(Revised 07/04)

✓ appropriate box

- ☒ Individual  
☐ Partnership  
☐ Corporation  
☐ Sole Proprietorship  
☐ Limited Liability Company

SS#

(b) (6)

KNOW ALL MEN BY THESE PRESENTS: That, ✓ Everett (b) (6) Rogers doing  
business as a ✓ INDIVIDUAL (Full name of individual, partnership, corporation, sole proprietorship, or limited liability company) (Identify)  
under the laws of the State of ✓ Florida  
residing or having a principal place of business at (b) (6) Lake City, FL (b) (6)  
appoints ✓ D&L CHB, LLC (Grantor'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, unloading 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, unloading, 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 (Grantor'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 ✓ Everett (b) (6) Rogers  
caused these presents to be sealed and signed: (Signature) ✓ (b) (6)  
(Capacity) ✓ N/A Date: ✓ 10-26-17  
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.



D&L CHB, LLC  
1500 MIDWAY CT. W201  
ELK GROVE VILLAGE, IL 60007

BANK ONE  
CHICAGO, IL 60670  
2-1-710

DATE	CHECK NUMBER
------	-----------------

04/10/18

(b) (4)

PAY  
\*\*\*\*\*100DOLLARS&00CENTS

CHECK AMOUNT
--------------

PAY TO THE ORDER OF:

\$100.00\*\*

FISH & WILDLIFE

IL

(b) (4)

*Amara Dubeld*

(  
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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RENEE SNIDER

April 10, 2018

Chief, Branch of Permits  
U.S. Fish and Wildlife Service  
Division of Management Authority, MS: IA  
5275 Leesburg Pike  
Falls Church, Virginia 22041-3803

RCVD APR 16 2018

**Re: Application for a permit to import a sport-hunted elephant trophy**  
**BY FEDERAL EXPRESS**

Dear Acting Chief:

Enclosed please find one application for a permit to import the trophy of an African elephant to be hunted in the N\$ua Jagna Conservancy in Namibia. Please see the enclosed information about this conservancy, as well as information in the DMA's files from the Namibian Association of CBNRM Support Organizations (NACSOS), Namibia's Ministry of Environment and Tourism, Conservation Force, and others. This information demonstrates that elephant hunting in Namibia is well-managed, sustainable, and beneficial for the rural communities that rely on the revenue from elephant hunting most of all to maintain the >180,000 km<sup>2</sup> of habitat set aside in conservancies. Please consider this information in making an enhancement finding for this applicant.

Thank you for your courtesy and attention to this application.

Sincerely,



Conservation Force



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](mailto:nacso@iway.na)



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[Home](#) » [N#a-Jaqna Conservancy](#)

## N#a-Jaqna Conservancy

Region: Otjozondjupa

Population: 3 698

Area km2: 9 120

Date registered: July, 2003

Address: N#a-Jaqna Conservancy, P.O Box 1049, Grootfontein

Telephone: 067-245047

Geographical features:

Average annual rainfall of 400-450 mm. Kalahari sands cover flat landscape of broadleaf and acacia woodland.

Unusual or important features: Traditional culture of San people.

Major wildlife resources:

Elephant, leopard, eland, duiker, steenbok, gemsbok, kudu, giraffe, black-backed jackal, cheetah, warthog, spotted hyaena.

Management:

Management Committee of eight men and four women; additional members from traditional authority; no

Quick links

Ministry of Environment  
and Tourism (MET)  
website

MET regional offices

Photo Library



North East game count

NACSO full  
members

SRT

CCF

IRDNC

OAT

MRCC-UNAM

» See all NACSO  
members

NACSO partners

Funding partners

Hunting partners

Tourism partners

Government Agencies

Where we are

Location of...



Map data ©2018 Google Terms 21



Website by JARO Consultancy

Copyright © NACSO 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 Elephant 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: \_\_\_\_\_

(b) (6)

Name: \_\_\_\_\_

Lester

(b) (6)

Bente

Date: \_\_\_\_\_

March 30, 2018





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: 1A  
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 <b>BENTZ</b>	1.b. First name <b>Lester</b>	1.c. Middle name or initial <b>(b) (6)</b>	1.d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	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>(b) (6)</b>					
1.b. City <b>Palm City</b>	1.c. State <b>FLA</b>	1.d. Zip code/Postal code: <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>	
2.a. Mailing Address (Include if different than physical address. Include name of contact person if applicable) <b>(b) (6)</b>					
2.b. City <b>Nashville</b>	2.c. State <b>Tenn</b>	2.d. Zip code/Postal code: <b>(b) (6)</b>	2.e. County/Province	2.f. Country <b>USA</b>	

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. <b>(b) (6)</b>	
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) <b>Bentz</b>	Date of signature (mm/dd/yyyy) <b>3/30/18</b>

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)?

(b) (6) *BENTZ* (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.

LOXODONTA AFRICANA - AFRICAN ELEPHANT

- 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, NHA JAGUA CONSERVANCY  
BUSHMANLAND CLOSEST TOWN: TSUMKWE

- b. Date wildlife is to be hunted: AUGUST 1-18, 2018

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

THORMAHLEN & COCHRAN SAFARIS, PH & PETER THORMAHLEN

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:

- 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 YET AVAILABLE

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: AFRICAN SHIPPING SERVICES CC  
Business Name: RAINER SENTFOL  
Address: 46 TV MOOLE STREET  
City: SOUTHERN INDUSTRIAL,  
State/Province: WINDHOK, NAMIBIA  
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 REPORT  
FROM OPERATOR

- 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?

U

- 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?

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**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:** 3-30-18

*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).



EQUATOR  INITIATIVE



Empowered lives.  
Resilient nations.

# N≠A JAQNA CONSERVANCY

Namibia



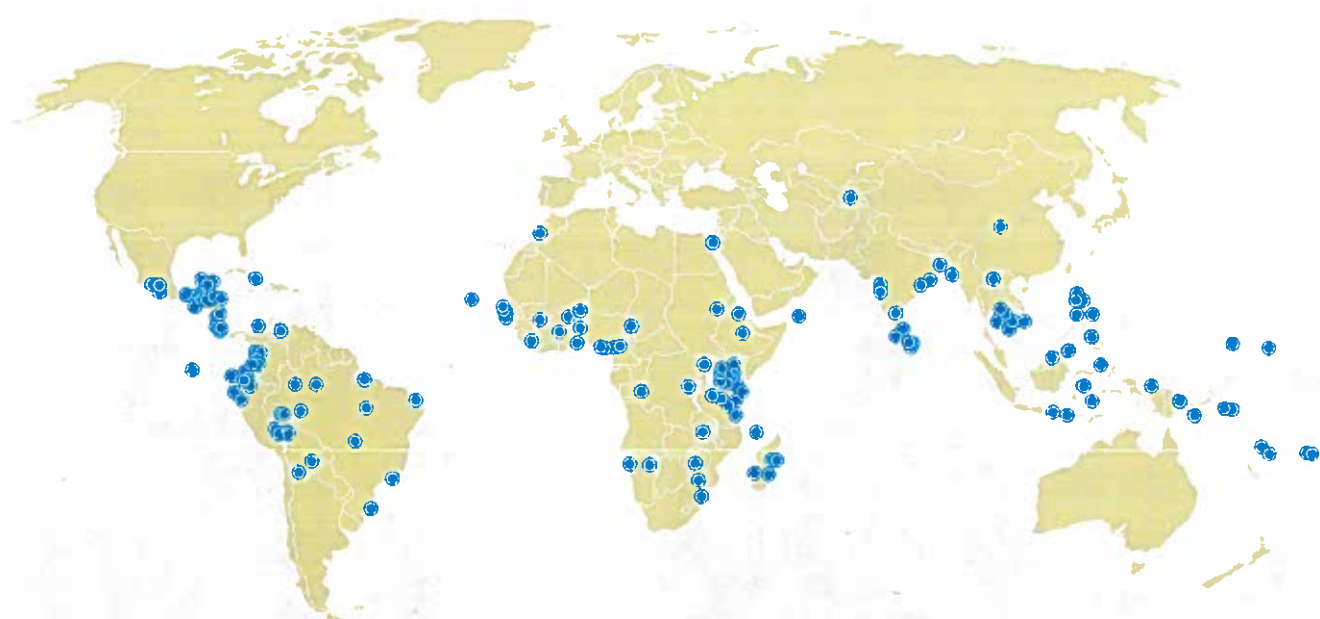
## Equator Initiative Case Studies

Local sustainable development solutions for people, nature, and resilient communities

# UNDP EQUATOR INITIATIVE CASE STUDY SERIES

Local and indigenous communities across the world are advancing innovative sustainable development solutions that work for people and for nature. Few publications or case studies tell the full story of how such initiatives evolve, the breadth of their impacts, or how they change over time. Fewer still have undertaken to tell these stories with community practitioners themselves guiding the narrative.

To mark its 10-year anniversary, the Equator Initiative aims to fill this gap. The following case study is one in a growing series that details the work of Equator Prize winners – vetted and peer-reviewed best practices in community-based environmental conservation and sustainable livelihoods. These cases are intended to inspire the policy dialogue needed to take local success to scale, to improve the global knowledge base on local environment and development solutions, and to serve as models for replication. Case studies are best viewed and understood with reference to [\*The Power of Local Action: Lessons from 10 Years of the Equator Prize\*](#), a compendium of lessons learned and policy guidance that draws from the case material.



*Click on the map to visit the Equator Initiative's searchable case study database.*

## Editors

**Editor-in-Chief:** Joseph Corcoran

**Managing Editor:** Oliver Hughes

**Contributing Editors:** Dearbhla Keegan, Matthew Konsa, Erin Lewis, Whitney Wilding

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## Acknowledgements

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## Suggested Citation

United Nations Development Programme. 2012. *Nꝰa Jaqna Conservancy, Namibia*. Equator Initiative Case Study Series. New York, NY.



# N≠A JAQNA CONSERVANCY

## Namibia

### PROJECT SUMMARY

With 912,000 ha of communal land, N≠a Jaqna Conservancy combines the sustainable management of endemic wildlife and natural resources with the empowerment of Namibia's !Kung San people. (Symbols '≠' and '!' represent distinct click sounds unique to Khoisan languages.) Established as a conservancy in 2003, the organization trains local !Kung San as wildlife managers, committee members and game guards. Objectives include ret-establishing game populations and sustainable forest management through sound planning, management and monitoring.

The governance structure for the conservancy, is prescribed by Namibian law as part of its successful Community Based Natural Resource Management Programme. In addition, the N≠a Jaqna Conservancy has evolved a highly consultative governance model that matches the unique leadership system of the !Kung San people.

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Key Activities and Innovations	5
Biodiversity Impacts	7
Socioeconomic Impacts	8
Policy Impacts	9
Sustainability	10
Replication	10
Partners	11

### KEY FACTS

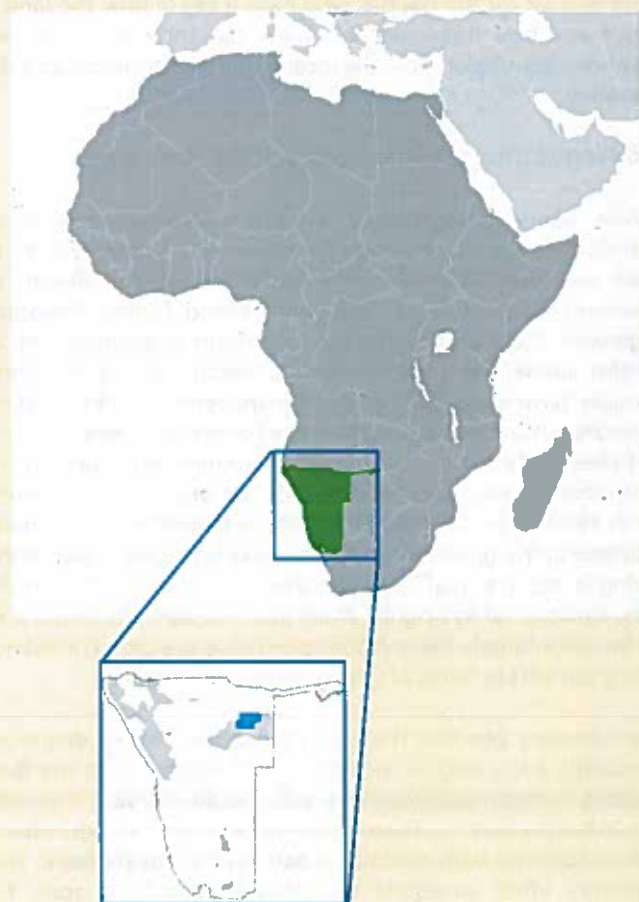
EQUATOR PRIZE WINNER: 2008

FOUNDED: 2003

LOCATION: Otjozondjup, northeastern Namibia

BENEFICIARIES: Over 2,650 community members

BIODIVERSITY: 9,120 sq. km. community conservancy



# Background and Context



Namibian land policy allows for the creation of conservancies within existing communal areas in which traditional leaders enter into collaborative land management agreements with the state. The conservancy management structure gives members of the conservancy shared rights to that land, while the government holds the land in trust for the people, who have a say in how the land is managed and how it is used. No others can enter or occupy the land without permission from the local traditional authority and the conservancy.

## *CBNRM legislation and the history of the N=ã Jaqna*

The N=ã Jaqna Conservancy in the north-east region of Otjozondjupa, one of only two San-governed Conservancies in Namibia, was gazetted in December of 2003 under the Ministry of Environment and Tourism's Community-based Natural Resource Management (CBNRM) Programme as a result of peoples' lack of land rights and fear of lack of ownership. Because of this, the !Kung San people have since been granted management and utilization rights to the natural resources within the Conservancy and exclusive rights to benefit from the development of tourism in the area. While the conservancy was gazetted in 2003, the process began much earlier in 1998 when 1,850 members of the largely San community first applied to the government for conservancy rights. Many of the San living in the area had been relocated during the conflict in the country, some as far as Angola. While this increased the number of San in the area (largely those of the same language group) it did not bring any benefits in terms of land security or investment.

The Conservancy provides the !Kung San people with a degree of land security; it is a way for people to earn income from the land by utilizing natural resources in a sustainable manner. They can engage in trophy hunting if game is plentiful, small-scale agriculture, and other activities with minimal impact on the environment. This arrangement offers an equitable option for people to apply for formal rights to the land – a process not often available to local communities.

## *Creating a community management plan*

Though the Conservancy is a government program, all decisions – from measuring and designating boundaries to the allocation of responsibility within the Conservancy – require the support of the entire community (estimates range from 2,000 to 5,000 people) many of whom are illiterate or minimally educated. The founding of the conservancy required the vast majority of the people to be in favor of the management plan, and though it took nearly five years, the necessary support was eventually procured.

N=ã Jaqna is currently the largest registered conservancy in Namibia to date, with an area of more than 9,120km<sup>2</sup>. Kalahari sands cover a flat landscape of broadleaf and acacia woodland which receives a paltry 400-450mm of rainfall in an average year. The vast majority of Conservancy inhabitants rely on the land and resources of this environment for bush foods, medicines, grass and wood for building, fuel in the form of firewood, as well as grazing and cropping. The Conservancy is host to a vast amount of biodiversity as well as high-value game species and commercially viable plants utilized for their medicinal value. The large size of the area provides ample areas well suited to wildlife habitat. The large size also means that many villages are isolated and the costs of operating the Conservancy are higher than in other conservancies due to the scattered nature of settlement and resources.

For the purposes of management, the Conservancy has been divided into four districts. A comprehensive participatory planning exercise in all the settlements of the Conservancy has resulted in a resource-zoning scheme that has been agreed to by the Conservancy membership, the local !Kung Traditional Authority, as well as governmental and non-governmental stakeholders. This zoning plan is reflected in the Constitution of the Conservancy and the official Management and Utilization Plan. Business and tourism development strategies are now in place and are being implemented in concert with these guiding community-based management plans.



# Key Activities and Innovations



The management and utilization plan of the conservancy, agreed to by the inhabitants of the area, provide for the following central objectives: to re-establish optimum game populations in the Conservancy through sound management and careful, responsible planning; to ensure that the benefits derived by membership through the utilization of wildlife are sustainable and that these benefits are delivered to all members of the Conservancy; to prevent conflict between segments of the Conservancy membership and between the Conservancy membership and wildlife; and to improve the livelihoods of all members of the Conservancy through the distribution of benefits from viable tourism operations in the Conservancy.

Due to poaching and the over-harvesting of local flora within the surrounding areas, plant and wildlife populations had declined in the years leading up to the conservancy's creation. Concerned by the decline in biodiversity, the conservancy, with the help of donors, has been able to reverse this trend to some degree, through the

mixed use of careful conservation and sustainable tourism practices. One of the main activities has been the introduction of more wildlife into the area through partner support.

Over 2,650 community members currently belong to the conservancy and hold decision-making power on how their land is developed and managed. Tourism, gaming contracts and the sustainable collection of indigenous plant species (such as the Devil's Claw, or *Harpagophytum procumbens*) are sources of income for the otherwise economically marginalized !Kung San people. Conservation is bolstered by indigenous knowledge and traditional land management practices. In addition to a Community Forest Programme, the group is engaged in tour guide and game guard training, has supported two successful community-run tourism initiatives, and actively pursues partnerships with commercial tour companies and private hunting contractors.

## *Sustainable wildlife management*

Once game animals were brought to the area, the conservancy was able to form an anti-poaching unit—game guards—who run patrols under the employ of the Conservancy. Working not only to secure the safety of the animals, but also to help enhance the health of the ecosystem, the game guards engage in practices such as digging out water holes to increase the volume of water available to both the animals and the human inhabitants.

The increased abundance of game animals has given rise to a very successful tourism practice as well. The Nǀa Jaqna Conservancy has a contract with a trophy hunting agency that in turn imports game animals each year. The acceptable quota for trophy hunters is quite specific in order to only take what can be easily recovered within the population of animals in the area, and the rules governing the quota are strict: for instance, during breeding periods it is forbidden to shoot near water holes, while pregnant animals may not be killed. Tourists pay high prices to hunt in the area and a good portion of that money goes back into the conservancy, enabling it to sustain





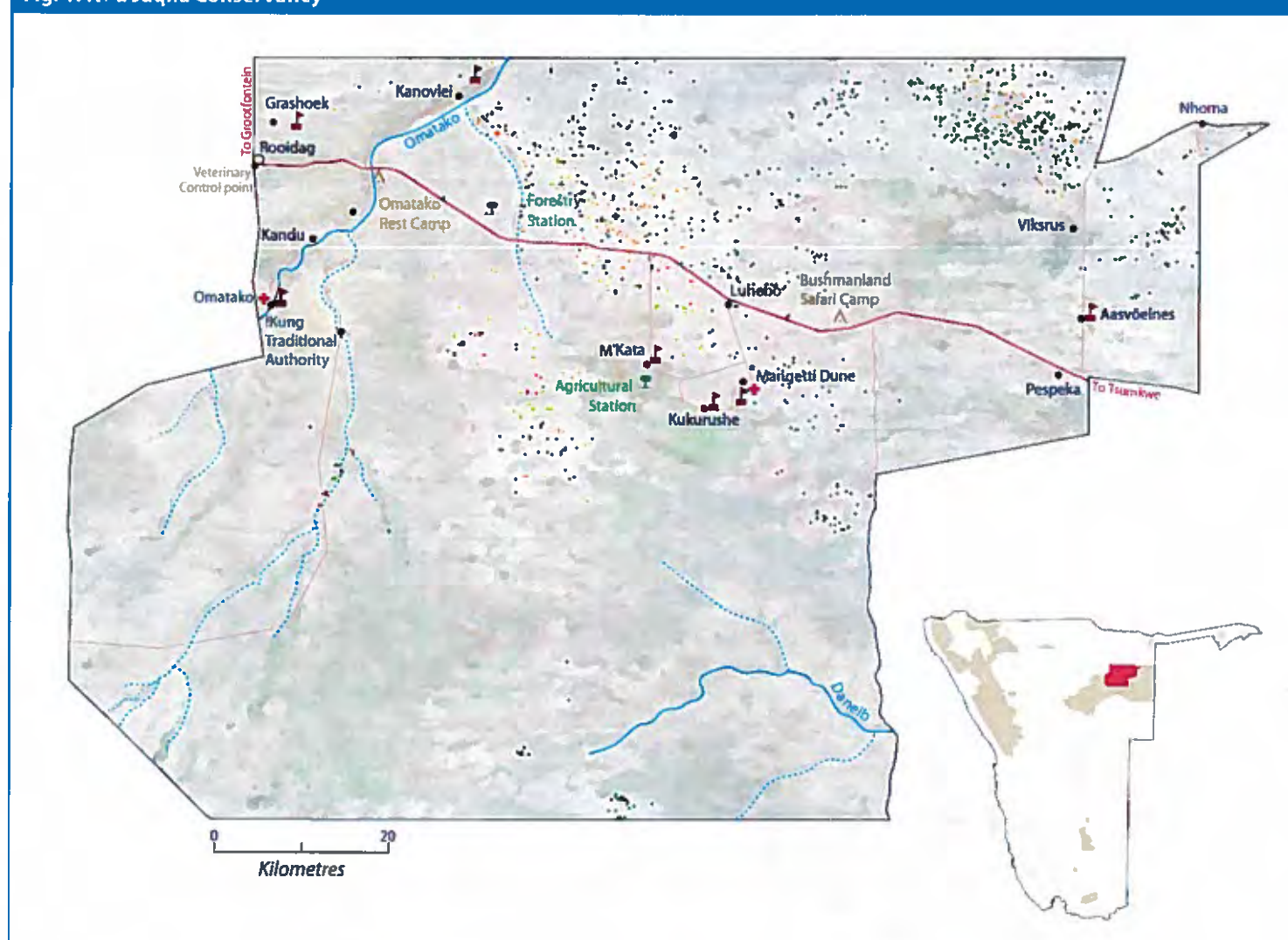
itself in terms of managing the water supply and future generations of game animals. When trophy hunters make a kill, they are not allowed to take the whole animal; the hunter is allowed to remove the head or another small part of the animal (designated by law), but the main part of the animal goes to the conservancy as meat. The people receive not only money, but food from this arrangement as well, and it is also a way of reducing poaching. The !Kung San lack a great deal of food security, so the provision of a regular meat source – one that also provides monetary income – helps to stigmatize and thus reduce instances of poaching.

### *Use of indigenous plants and traditional knowledge*

Another important activity to monitor is plant use. Historically, the conservancy enjoys a substantial income from harvesting Devil's Claw, a plant used for treating arthritis and rheumatism. When the market for Devil's Claw first emerged, there was a drive to harvest

as much of the plant as possible and sell it at the highest possible price, potentially limiting or even eliminating a resource necessary to the economy of the area. Devil's Claw takes approximately 2-4 years to grow to maturity, and so the conservancy was motivated to become extremely proactive in the management of harvesting. The harvesting of Devil's Claw is now carefully monitored: the number of harvesters certified by the Ministry of Environment and Tourism is limited and the season available for people to harvest has been reduced substantially. Additionally, the Conservancy's crop of Devil's Claw has been certified organic on a South African regional level, and the area is regularly surveyed to ensure appropriate re-growth and abundance. If the levels of Devil's Claw are insufficient, the organic certification can be revoked. Having the organic certification also raises the price of the produce, giving the people of the conservancy about 15% more in profits than they would otherwise receive.

**Fig. 1: N=Ja Jaqna Conservancy**



Source: NACSO. 2010. *Namibia's communal conservancies: a review of progress and challenges in 2009*. NACSO, Windhoek. p. 112.

# Impacts



## BIODIVERSITY IMPACTS

Through the contract with the trophy hunting agency, around 250 new game animals are introduced into the conservancy each year. In addition, there is evidence that the animals currently living within the conservancy are reproducing in good numbers, based on reports from the game guards. This demonstrates the Conservancy's clear net gain in terms of wildlife population.

### *Increases in key wildlife species*

The conservancy has seen resurgences in elephant, giraffe, wild dog and roan antelope populations. Commonly spotted species include eland, caracal, blackback, jackal, kudu, duiker, steenbok, warthog, porcupine, shrub hare, bat-eared fox, brown hyena (listed as vulnerable) and spotted hyena.

Due to the remote location and lack of infrastructure, few large scale reviews have been done. However, the number of game introduced between 2006 and 2009 totaled 399 animals, including blue wildebeest, eland, giraffe, oryx and kudu, as well as a few ostrich.

There have also been camera trap placements at one water hole which shows a very active population, including leopards, wild dogs (listed as endangered), brown hyena and elephants.

N̄a Jaqna recently had their community game guards, who carry out anti-poaching patrols over the Conservancy's vast area, rated as one of the best such groups in Namibia by the Ministry of Environment and Tourism (who rewarded them with horses to increase the guards' ranges). Alongside this approach is a focus on reducing human-wildlife conflict – for instance by investigating and promoting rangeland management techniques which allow cattle-grazing and wildlife to co-exist.

### *Sustainable harvesting of Devil's Claw*

As for the Devil's Claw harvest, much has been done to manage and sustain this critical component of the area's indigenous genetic diversity. Conservancy leaders go to each village and train individuals within the conservancy on how to harvest the Devil's Claw. After training, a limited number of certified harvesters are registered for the four-month harvest period. During the harvest, the registered individuals continue to be monitored. If conservancy leaders find that they are not practising sustainable harvesting techniques, their permit is cancelled and they are no longer able to harvest. This practice is supported by the Ministry of Environment and Tourism, which issues the permit.

Throughout Namibia, there is a clear set of best practices for the Devil's Claw harvest, and N̄a Jaqna conservancy has adapted those best practices to fit the practices of individual and family-based harvesting groups. For example, there are specific measurements in terms of the size of the plants and tubers that people are taking, and as long as harvesters keep the main taproot intact, the plant will regenerate on its own. By adhering to these guidelines, it is clear which plants are damaged and which ones will regenerate, and the conservancy, by controlling the purchase and shipment of Devil's Claw within and outside of the area, has been able to greatly increase the amount of economic and social benefits that the harvesters receive as well.

### *Participatory land use planning and monitoring*

In terms of human interaction with biodiversity, the conservancy engaged in a scheme of participatory resource zoning in each of the 19 villages in the conservancy. The villages were surveyed in order to learn which areas have higher concentrations of various foods (both flora and fauna) and medicines that people are utilizing – the end goal being to protect those areas where biodiversity exists and where it could potentially flourish. The conservancy has set apart areas for human settlement, for mixed farming, cropping, cattle keeping, and



small stock rearing, as well as for undisturbed wildlife. In this way, the !Kung San have made efforts to keep these at times conflicting land uses separate so that the biowealth of the conservancy may continue to exist and expand.

The Conservancy's policies have limited destruction of the fragile ecosystem of Nǃa Jaqna, much of which is still untouched wilderness. Specific risks which the Conservancy deals with include overgrazing by the few farmers within the area (and a much bigger risk of farmers from the surrounding area), associated bush clearance, illegal deforestation (especially the cutting and selling of protected hard wood trees), over harvesting and illegal trade in Devils Claw, and poaching. The projects and policies of the Conservancy, and the monitoring provided by community game guards counteract these risks.

Certain plant and animal species are monitored by the Ministry of Environment and Tourism, and community game guards keep "event books" which log sightings and activities. Over time it will be possible to build up an assessment of impacts from these records, but in the nine years the Conservancy has been operating this has not yet been collated.

Instead, impacts are measured from feedback by community game guards and the local population. Whilst this might be presumed to be unscientific, the vast experience of most Conservancy members in bush and wildlife knowledge – most of them having lived their lives in wildlife rich areas with very close interactions with the surrounding environment, not to mention the traditional knowledge passed down in San culture – has ensured the collation of a rich body of knowledge on ecosystem management.

## SOCIOECONOMIC IMPACTS

The target beneficiaries are the residents of Nǃa Jaqna Conservancy, the majority of whom (~85%) are indigenous San people, and nearly all of whom are poor rural dwellers with low education, surviving on subsistence farming, wild food collection and drought relief supplies.

### *Economic benefits from sustainable harvesting*

After 2007, when the monitored Devil's Claw harvest began in Nǃa Jaqna under the auspices of the conservancy, the membership of the conservancy received approximately N\$1.2 million in direct economic benefit from the harvest. Devil's Claw harvest generated over N\$200,000 in revenue for the community in 2007, with this amount increasing to N\$950,000 in 2009. This increase was due not only to a larger harvest, but also from increased prices from organic certification, increased quality and improved negotiations with the supplier.

The conservancy as an institution is also generating some income for people who are members but are not directly involved with the harvesting, thanks to an additional premium from the buyer to the conservancy on each kilo of Devil's Claw harvested. The conservancy is a major worldwide player in the Devil's Claw market, particularly



in the organically certified market; in 2008, Nǃa Jaqna was the single largest Namibian producer of organically certified Devil's Claw. The money generated from the Devil's Claw harvest is substantial, and according to the Conservancy's benefit distribution plan, the first priority for its investment is pre-schools.

### *Improved incomes, food security, and gender equality*

There are other sources of jobs and income from the tourism arrangement with the trophy hunting organization, and the resulting meat brings additional food security. In addition, there are further job opportunities in terms of game guards, conservancy staff, and people involved in various projects that the conservancy runs.

Though there is not much in the way of infrastructure in the conservancy area, there have been economic indicators that the jobs and additional income are having a positive effect; for example, there is an increase in cattle ownership – which requires considerable investment on the part of the individual. Trophy hunting partners provide between 20 and 30 carcasses per year from their farm as meat distributed to the community, which is an important addition in an area with low food security.

Though there continues to be an educational disparity between men and women in the conservancy, many of the projects in Nǃa Jaqna focus especially on gender inclusion. Women are in charge of the Devil's Claw harvest and the training of new harvesters. Each village has a female team leader for the harvest who is responsible for making sure that the harvest is conducted in a sustainable manner, maintaining a position of authority over all harvesters.

Overall, the role of women in the conservancy is very strong; Nǃa Jaqna's constitution guarantees 50/50 representation in the Conservancy's village leadership committee structure—generally a man and a woman from each village. In some cases, there may be two women from one village and two men from another, but the leadership structure is held equal overall. In the management committee, which is comprised of 4 people, there are two women and two men.



### *Enterprise development, education, and health*

Very few people had access to cash income or employment before the Conservancy was established. The Conservancy now employs 12 local people full time, and members enjoy cash incomes from the sale of Devil's Claw, various wood products, craft and increased tourism revenue. A number of conservancy-run projects also provide livelihood opportunities including: chicken and melon growing projects in two villages; vegetable gardens in nine villages; two tourism sites; and a pilot ostrich farm to provide egg shell to craft makers (San jewelry is traditionally made from ostrich eggshell).

The Annual General Meeting decided in 2010 to invest a portion of profits into education, specifically early childhood development in the region. The increased frequency of transport due to the Conservancy activities means that their vehicle frequently serves as an ambulance in the area, providing much needed access to the only operational health clinic.

## **POLICY IMPACTS**

There are now quite a few wildlife conservancies in Namibia, but Nǀa Jaqna is one of the most well-known and well-respected, particularly with the Ministry of Environment and Tourism. After winning the Equator Prize in 2008, Nǀa Jaqna's success lent credibility to the entire conservancy scheme, and promoted environmental awareness within Namibia as a whole. It has also served to strengthen community-based natural resource management; in terms of land security and in terms of the conservancy, members of the !Kung San have earned income, causing both policymakers and the general public to see them as more productive members of Namibian society, which in turn makes it very difficult for them to challenge the legitimacy of the conservancy both in terms of its land area and as a legal body.

Historically, the !Kung San are a very non-combative people, and have generally moved from the area when challenged. Because of this lack of confidence in their land rights, over the last 1,000 years,

they have ended up with occupying some of the worst areas of land in Southern Africa. Owning a project and managing the land in which this project operates – and wanting to continue to operate that project – is part of the process of interacting with the state, which requires a confidence and a political voice that had traditionally escaped the !Kung San.

### *Highly democratic governance processes*

The people of Nǀa Jaqna are also extremely engaged in the management of their conservancy. Though the area is still fairly lean in terms of infrastructure, conservancy leaders actually drive from village to village to have the management plans discussed with and endorsed by the entire membership of several thousand. In this way, there is a true democracy of management.

*“Conservancy leaders literally travel village by village to gain the endorsement of the conservancy’s membership. They either round everybody up into one place, or work with three or four villages in a day: having one meeting, driving three or four hours, having another meeting. They just carry on - sleeping in the villages and going through the conservancy until they’re done with the full consultation.”*

*Ben Begbie-Clench, Namibia Support Unit Manager at the Working Group of Indigenous Minorities in Southern Africa (WIMSA)*

Because the !Kung San do not have a hierarchically-structured leadership system, their leaders are really more akin to chairmen who oversee debate between the villagers. Each member over the age of 18 is given his or her voice in making conservancy decisions.

### *Strengthening local rights to land*

In some areas of practice, Nǀa Jaqna has become a role model for other conservancies, and exchange visits have resulted. However in terms of national policy there has been much less influence, and some of this should be put down the San's marginalized social status within the country and region, which inhibits state interaction. An exception is the defense of land rights in Nǀa Jaqna where planned small scale farms which would dispossess the San of land and destroy environmentally sensitive areas have been opposed through Nǀa Jaqna Conservancy by the community. Whilst this is not policy change, it has promoted adherence to national law and a respect for democratic processes which was not previously the case. This action vastly strengthened the community's knowledge of their rights and ability to interact with the state.



# Sustainability and Replication



## SUSTAINABILITY

The sustainability of the N̄a Jaqna Conservancy depends on the people seeing the benefits of the project and wanting to be a part of it, and the highly democratic nature of its governance is a huge factor in its desirability. This degree of participation is perhaps not the most cost-effective (so much travel requires fuel and vehicle upkeep), but in the end, sacrificing the high level of democracy would prove a greater barrier to sustainability than the increased monetary costs. In addition, the Conservancy's management has worked hard to build lasting relationships with their partners. As an example, the Conservancy does not increase their contract price annually or open a yearly bid for partnership with other trophy hunting companies; though in the short run, this may result in less of a profit for the !Kung San, the mutually beneficial agreement will, over the next ten years, provide a greater and more reliable profit in the long run.

There are certainly challenges to the Conservancy's sustainability, however. Though N̄a Jaqna is becoming more financially independent through its trophy hunting contract and the sale of Devil's Claw, true independence from current donors would bring a level of financial responsibility as yet unseen. The !Kung San, however, are in a unique position for success, owing to the desirability of the pristine quality of their beautiful and remote area as a destination for eco-tourism.

Threats to sustainability will only increase as time goes on; the need for farmland and grazing area only increases with Namibia's growing population, and changes in behavior and migration routes of game animals could occur under the influence of global climate change – a major threat in such an arid region. Luckily, the !Kung San of N̄a Jaqna are strongly committed to success, for they understand the consequences of damaging their fragile ecosystem; they understand that there will likely be no second chance. Community participation and private partnerships have been the key components to N̄a Jaqna's ongoing success, combining a democratic approach with

economic benefits. Another contributing factor is the knowledge of the land and environment held by the participants, which has been adapted to new ends.

## REPLICATION

There has already been replication and knowledge exchange between N̄a Jaqna and other communities and conservancies throughout Namibia, sharing best practices in tourism activities and land management techniques. N̄a Jaqna is one of the most successful and well-known conservancies in Namibia, lending weight to the conservancy approach. Additionally, there is a great deal of knowledge exchange with not only other communities, but with Namibian society as a whole. Learning about and understanding the needs of tourists and visitors to the Conservancy has enabled the !Kung San of N̄a Jaqna to adapt their methods in ways that are both beneficial to their community and appealing to visitors – further encouraging the sustainability of the project. In exchange, when tourists and non-community members visit the conservancy, they are exposed to an often unseen land of largely undisturbed ecosystem filled with native plants and animal species, rather than cattle or larger-scale agriculture. This exposure further underlines the importance and effectiveness of community land management, encouraging the growth and acceptance of the conservancy scheme on a wider level.

There have been a number of exchange partners, including mutual exchanges with Nyae Nyae Conservancy, other Namibian Conservancies and a San group from Botswana. N̄a Jaqna staff have visited a number of Conservancies in northern Namibia, and even San groups in Angola.

There are barriers to knowledge exchange, primarily in the realm of educational level and the steep learning curve associated with successful conservancy management. However, the !Kung San community members who have a greater degree of education



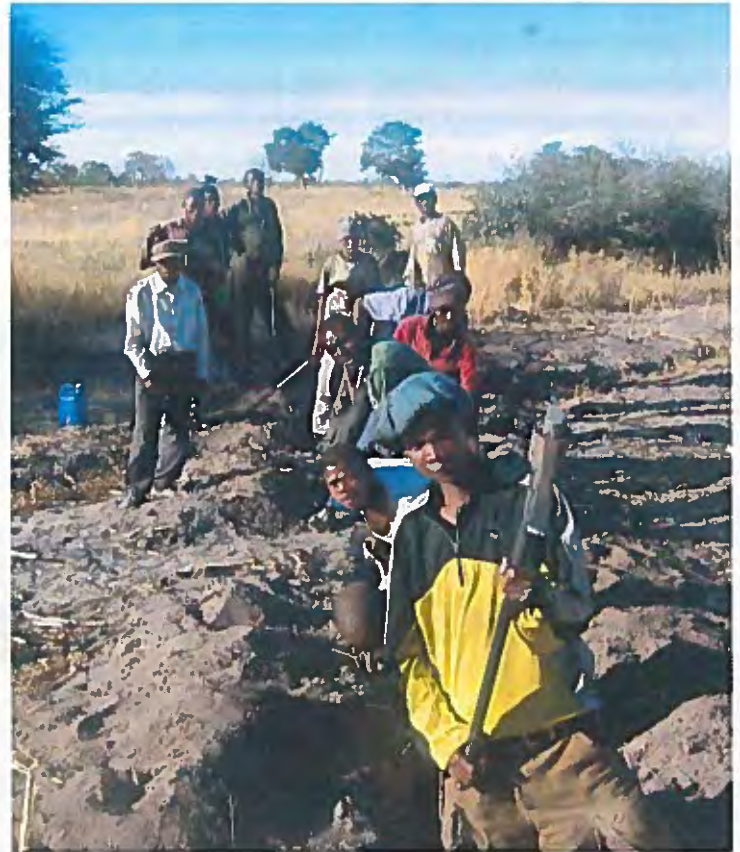
have been indispensable in the process of adapting and training the community as a whole. They have become essential leaders who possess a cultural and traditional knowledge base lacking in outsiders and the know-how to instruct and manage the Conservancy successfully.

## PARTNERS

The Nꞛa Jaqna Conservancy is a unique partnership between the Namibian government, the World Bank, international NGOs, and private business. This diverse partnership arrangement is critical for the continued success of the project, bringing stakeholders together from many different sectors around the world. In this way, global expertise melds with local on-the-ground knowledge to create a sustainable and replicable initiative.

Most critical in this partnership is the support of the Namibian government, the UNDP GEF-Small Grants Program, international NGOs, and Eden Trophy Hunting (a privately-owned business). Other partners include:

- Working Group of Indigenous Minorities in Southern Africa (WIMSA)
- Ministry of Environment and Tourism
- World Wildlife Fund
- DED (German Development Service; now GIZ)
- Namibian Association of Norway (NAMAS)





## FURTHER REFERENCE

- NACSO. 2010. *Namibia's communal conservancies: a review of progress and challenges in 2009*. NACSO, Windhoek. [http://www.nacso.org.na/SOC\\_2009/index.php](http://www.nacso.org.na/SOC_2009/index.php)
- Suzman, J. 2001. *An Assessment of the Status of the San in Namibia*. Legal Assistance Center. [http://www.equatorinitiative.org/images/stories/2008winners/NA\\_Jagna\\_Conservancy/sannami\\_na\\_jagna.pdf](http://www.equatorinitiative.org/images/stories/2008winners/NA_Jagna_Conservancy/sannami_na_jagna.pdf)

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April 16, 2018

US Fish and Wildlife Service  
Division of Management Authority  
Branch of Permits, MS: IA  
5275 Leesburg Pike  
Falls Church, VA 22041-3803

RCVD APR 19 2018

**Federal Fish and Wildlife Permit Application Form**

Dear Sir or Madam:

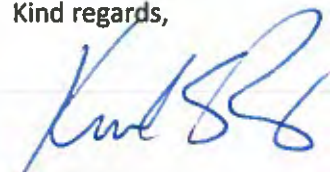
In August of 2013 I participated in a hunting safari in Namibia. Specifically, the safari took place in the Kwando Concession in the Bwabwata National Park in the Caprivi Strip of northeaster Namibia. I hunted with Allan Cilliers Hunting Safaris, a reputable and renowned company run by Allan, a long time figure in the anti-poaching and wildlife conservation efforts in Namibia. His son, Wayne Cilliers, was my professional hunter for the trip.

During this hunt I successfully obtained a bull elephant. At the time I was living in Paris, France on assignment for my company, and arranged for shipment of the tusks to my residence in Paris. The tusks were successfully exported from Namibia and imported to France (related CITES documents included in this application). Shortly thereafter I moved again, this time to Brussels, Belgium. In July of 2017, my assignment in Europe ended and I repatriated back to the US and am now living in Princeton, NJ.

This application is related to obtaining authorization from the US Fish and Wildlife Department to import the tusks. They currently are stored in a warehouse in Machelen, Belgium with Compas International Movers. I have received CITES re-export permits (included in this application) from Belgium.

Thank you for your attention to this application. If you should have any questions, please do not hesitate to contact me.

Kind regards,



Kenneth Shives

(b) (6) Princeton NJ, (b) (6)

(b) (6)



RCVD APR 19 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 <b>Shives</b>	1 b. First Name <b>Kenneth</b>	1 c. Middle Name/Initial <b>(b) (6)</b>	1 d. Suffix <b>-</b>
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number <b>(b) (6)</b>	3 a. Alternate Telephone Number <b>(b) (6)</b>	4. E-mail address <b>(b) (6)</b>

## 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>(b) (6)</b>				
1 b. City <b>Princeton</b>	1 c. State <b>NJ</b>	1 d. Zip code/Postal code <b>(b) (6)</b>	1 e. County/Province <b>(b) (6)</b>	1 f. Country <b>USA</b>
2 a. Mailing address (include if different than physical address, include name of contact person if applicable) <b>Same as above</b>				
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. <b>(b) (6)</b>
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) <b>(b) (6)</b> Date of signature (mm/dd/yyyy) <b>04/16/2018</b>
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 on page 1

(b) (6)

Princeton, NJ (b) (6) USA

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

Kenneth Shives

(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.

Loxodonta Africana - African Elephant

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:

Namibia, Caprivi Strip, Kwando River Concession  
Bwabwata National Park, Bwabwata East  
Concession

b. Date wildlife was hunted:

August 2013

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

Allan Cilliers Hunting Safaris  
Wayne Cilliers - Professional Hunter

- 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]:

Compas International Movers

(b) (6)

(b) (6)

(b) (6)

BELGIUM

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: *Kenneth Shives*  
Business Name: *Compas International Movers*  
Address: (b) (6)  
City: (b) (6)  
State/Province: (b) (6)  
Country, Postal Code: *BELGIUM B-1830*

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?

*Reports in significant increase in elephant populations by Namibian government (7,500 in 1995 to 20,000 in 2016). Some areas over populated - using sport hunting to manage and generate revenue.*

- 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?

*Daily rates of \$35,000 and trophy fee of \$26,000. Trophy fees paid to Namibian government for conservation. Significant portion of daily rates go to community of villages and anti-poaching measures.*

- 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

*Significant conservation efforts by outfitter, mostly related to government concession fees and employing supporting anti-poaching activities/individuals. We came across anti-poaching teams in the field.*

**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: 4/16/2018

*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).

1	<b>Convention sur le commerce international des espèces de faune et de flore sauvages menacées d'extinction / Convention on International Trade in Endangered Species of Wild Fauna and Flora</b>  <b>ANNEXE AU PERMIS / CERTIFICAT – ANNEX TO PERMIT / CERTIFICATE:</b>		<b>N° / No</b> 2017/BE14000/PX														
	<input type="checkbox"/> INVOER IMPORT <input type="checkbox"/> UITVOER EXPORT <input checked="" type="checkbox"/> WEDER-UITVOER RE-EXPORT <input type="checkbox"/> OVERIGE: OTHER:		<b>2. Dernier jour de validité / Last day of validity</b> 21-JUN-2018														
ORIGINAL	B	<b>8. Description des spécimens (marques, sexe, date de naissance des animaux vivants) / Description of specimens (incl. marks, sex, date of birth for live animals)</b> CODE: TRO GENDER: 0,0,0 BIRTH DATE: / ADDITIONAL INFORMATION: Shoulder Mount with Horns		<b>9. Masse nette (kg) / Net mass (kg)</b> 20													
		<b>10. Quantité / Quantity</b> 1 pce		<b>11. Annexe CITES / CITES Appendix</b> II													
		<b>12. Annexe CE / EU Annex</b> B		<b>13. Origine / Source</b> W													
		<b>14. Objet / Purpose</b> P		<b>15. Pays d'origine / Country of origin</b> Tadjikistan													
		<b>16. N° de permis / Permit No</b> M11000111TJ		<b>17. Date de délivrance / Date of issue</b> 30/01/2013													
		<b>18. Pays de dernière réexportation / Country of last re-export</b>		<b>19. N° du certificat / Certificate No</b>													
		<b>20. Date de délivrance / Date of issue</b>		<b>21. Nom scientifique de l'espèce / Scientific name of species</b> Ovis ammon													
		<b>22. Nom commun de l'espèce / Common name of species</b> Argali		<b>23. Description des spécimens (marques, sexe, date de naissance des animaux vivants) / Description of specimens (incl. marks, sex, date of birth for live animals)</b> Code - Gender - Birth date - Identification - Add. info TUS-/-Other:NA 13 0053 21.60, NA 13 0054 22.06-21,60kg + 22,05kg=33,65kg													
		<b>24. Masse nette (kg) / Net mass (kg)</b> 43.66		<b>25. Quantité / Quantity</b> 2 pce													
		<b>26. Annexe CITES / CITES Appendix</b> III		<b>27. Annexe CE / EU Annex</b> B/A													
<b>28. Origine / Source</b> W		<b>29. Objet / Purpose</b> P															
<b>30. Pays d'origine / Country of origin</b> Namibie		<b>31. N° de permis / Permit No</b> 0043048															
<b>32. Date de délivrance / Date of issue</b> 01/08/2014		<b>33. Pays de dernière réexportation / Country of last re-export</b>															
<b>34. N° du certificat / Certificate No</b>		<b>35. Date de délivrance / Date of issue</b>															
<b>36. Nom scientifique de l'espèce / Scientific name of species</b> Loxodonta africana		<b>37. Nom commun de l'espèce / Common name of species</b> African Elephant		<b>38. Description des spécimens (marques, sexe, date de naissance des animaux vivants) / Description of specimens (incl. marks, sex, date of birth for live animals)</b>													
<b>39. Masse nette (kg) / Net mass (kg)</b>		<b>40. Quantité / Quantity</b>		<b>41. Annexe CITES / CITES Appendix</b>													
<b>42. Annexe CE / EU Annex</b>		<b>43. Origine / Source</b>		<b>44. Objet / Purpose</b>													
<b>45. Pays d'origine / Country of origin</b>		<b>46. N° de permis / Permit No</b>		<b>47. Date de délivrance / Date of issue</b>													
<b>48. Pays de dernière réexportation / Country of last re-export</b>		<b>49. N° du certificat / Certificate No</b>		<b>50. Date de délivrance / Date of issue</b>													
<b>51. Nom scientifique de l'espèce / Scientific name of species</b>		<b>52. Nom commun de l'espèce / Common name of species</b>		<b>53. Signature et cachet officiel / Signature and official stamp:</b> 													
<b>54. Nom du fonctionnaire chargé de la délivrance / Name of issuing official:</b> Grégoire Isabelle		<b>55. Lieu et date de délivrance / Place and date of issue:</b> Bruxelles, 21-DEC-2017		<table border="1"> <tr> <td></td> <td>Quantité/masse nette (kg) réellement importée ou (ré)exportée / Quantity/net mass (kg) actually imported or (re)exported</td> <td>Nombre d'animaux morts à l'arrivée / Number of animals dead on arrival</td> </tr> <tr> <td>B</td> <td></td> <td></td> </tr> <tr> <td>C</td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> </tr> </table>			Quantité/masse nette (kg) réellement importée ou (ré)exportée / Quantity/net mass (kg) actually imported or (re)exported	Nombre d'animaux morts à l'arrivée / Number of animals dead on arrival	B			C					
	Quantité/masse nette (kg) réellement importée ou (ré)exportée / Quantity/net mass (kg) actually imported or (re)exported	Nombre d'animaux morts à l'arrivée / Number of animals dead on arrival															
B																	
C																	



Original

IMPORT

2. Valid until

01/02/2015

OTHER:

3. Importer (name and address)

Kenneth Shives

(b) (6)

Paris

4. Exporter / Re-exporter (name, address and country)

A. Cilliers

P. O. BOX 214

Grootfontein

Namibia

Signature of the applicant

3a. Country of import

France

5. Special conditions

NA 13 0053 21.60 &amp; NA 13 0054 22.05

All imports and exports remain subject to veterinary regulations.  
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.

6. Name, address, national seal/ stamp and country of Management Authority



MINISTRY OF ENVIRONMENT AND TOURISM

Directorate: Scientific Services  
Private Bag 13306  
Windhoek  
NAMIBIA

5a. Purpose of the transaction (see reverse)

H

5b. Security stamp No.

1230103

7./8. SCIENTIFIC NAME (genus and species)  
AND COMMON NAME OF ANIMAL OR PLANT9. 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. *Loxodonta africana*  
African elephant

9. 2x Tusks

10. II W

11. 2item

11a. 40/90  
(2013)

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 \*\*\*

B 7./8. *Loxodonta africana*  
African elephant

9. belly skin &amp; 2x feet

10. II W

11. 3item

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 \*\*\*

C 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 \*\*\*

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 IS ISSUED BY:

J. Shapi

Windhoek

Place

Date

Security stamp, signature and official seal

14. EXPORT ENDORSEMENT:

15. Bill of Lading / Air Waybill Number

Block	Quantity
A	2 (TWO)
B	3 (THREE)
C	
D	

Port of Export / Re-export



Date

Signature

Official stamp and title

Original

Namprint: 2308

COPIE destinée au titulaire	2	1. Exportateur/réexportateur A.CILLIERS P.O. BOX 214 Pour le compte de Kenneth SHIVES  GROOTFONTEIN Namibie	<b>PERMIS</b> <input checked="" type="checkbox"/> IMPORTATION <input type="checkbox"/> EXPORTATION <input type="checkbox"/> RÉEXPORTATION <input type="checkbox"/> AUTRE:		N° FR1407527546-I				
		3. Importateur SHIVES Kenneth (b) (6)  (b) PARIS (6) France	 Convention sur le commerce international des espèces de flore et de faune sauvages menacées d'extinction						
		4. Pays (ré)exportateur  Namibie	5. Pays importateur  France						
		6. Emplacement autorisé de conservation des spécimens vivants des espèces inscrites à l'annexe A	7. Organe de gestion délivrant le permis/certificat <b>DRIEE ILE-DE-FRANCE</b>  10, rue Crillon  75194 PARIS Cedex 4						
2	8. Description des spécimens (marques, sexe/date de naissance des animaux vivants) 1 x Trophée de chasse d'Eléphant d'Afrique composé de :  - 1 x Défense de 21.60 Kgs marqué NA 13 0053 21.60 - 1 x Défense de 22.05 Kgs marqué NA 13 0054 22.05 - 1 x Peau du ventre - 2 x Pieds  Quota 40/90 (2013)	9. Quantité nette *****	10. Nombre de spécimen 1						
		11. Annexe CITES II	12. Annexe UE B	13. Origine W	14. Objet P				
		15. Pays d'origine Namibie							
		16. Numéro du permis 0043048		17. Date du permis 01/08/2014					
		18. Pays de dernière réexportation *****							
	TRO	19. Numéro du certificat *****		20. Date du certificat *****					
	21. Nom scientifique de l'espèce Loxodonta africana								
	22. Nom commun de l'espèce Eléphant d'Afrique 000LD6								
	23. Conditions spéciales Mise en vente, vente et utilisation commerciale du spécimen strictement interdites.								
Ce permis/certificat n'est valable que si les animaux vivants sont transportés conformément aux lignes directrices de la CITES en matière de transport et de préparation à l'envoi d'animaux sauvages vivants ou, en cas de transport aérien, conformément à la réglementation sur les animaux vivants publiée par l'Association du transport aérien international (ATA).									
	24. La documentation de (ré)exportation délivrée par le pays de (ré)exportation <input type="checkbox"/> a été présentée à l'autorité de délivrance <input checked="" type="checkbox"/> doit être présentée au bureau de douane frontalier d'introduction  L'original du permis ou certificat CITES délivré par le pays de provenance doit être envoyé sans délai par la douane à l'organe de gestion figurant en case 7, avec les feuillets original et vert du présent permis.		25. <input checked="" type="checkbox"/> L'importation <input type="checkbox"/> L'exportation <input type="checkbox"/> La réexportation des marchandises décrites ci-dessus est autorisée.  Pour le Préfet et par délégation, par empêchement du Directeur de la DRIEE-IF Le Coordinateur de la Cellule CITES   SANDOU Dilipp  PARIS Cedex 4 le 24/10/2014						
	26. Numéro du connaissement/le la lettre de transport aérien:								
	27. Réserve à la douane								
	<table border="1"> <tr> <td>Quantité/masse nette (kg) réellement importée ou (ré)exportée</td> <td>Nombre d'animaux morts à l'arrivée</td> </tr> <tr> <td>1</td> <td></td> </tr> </table>		Quantité/masse nette (kg) réellement importée ou (ré)exportée	Nombre d'animaux morts à l'arrivée	1		Document douanier Type: <b>IMA</b> Numéro: <b>440 982 32</b> Date: <b>10/12/11</b>		
Quantité/masse nette (kg) réellement importée ou (ré)exportée	Nombre d'animaux morts à l'arrivée								
1									





Permission is hereby granted in terms of the Nature Conservation Ordinance 1975 (Ord. 4 of 1975)

to hunt the specified number of game for the sake of trophies:

**CITES** indicates species listed on CITES Appendix I or II

SPECIES: COMMON NAME	Number
Steenbok	1x
Warthog	
Waterbuck	
Wildebeest, blue	
Zebra, Burchell's	
Zebra, Hartman's mountain	
Blesbok	
Wildebeest, black	
Cheetah	
Leopard	
Lion	
Other	
Reedbok	1x
*Please report back within 48 hours after shooting	

MINI Official MET date stamp  
AND TOL 1000  
REPUBLIC OF INDIA  
06 MAR 2013  
WINDHOCK  
Private Bag 13366, Windhoek  
Tel: 2842111 • Fax: 258651



The following certificate must be completed immediately after each animal that has been hunted (please print)

Date	Species	LH*	RH*	LB*	RB*	Total	RW*	Age	Male/ Female	Farm		Signatures					
										Name	No	Farm owner	Hunter	Professional hunter Master hunting guide Hunting guide			
09/8/13	Hippo	59	60	19	19	157		A	M			Barbados Est	[Signature]	[Signature]			
11/8/13	Elephant							A	M			Barbados Est	[Signature]	[Signature]			
15/8/13	Buffalo	212.5		33	33	278.5		A	M			Barbados Est	[Signature]	[Signature]			
										GIRTH CIRCUMFERENCE							
TISK (MICROSCHEIDING) TESTS										OUTSIDE CIRCUMFERENCE		INSIDE CIRCUMFERENCE		BEE CIRCUMFERENCE		LIP TO BASE WEIGHT	
Left										185 cm		146 cm		39.5		40.5	
Right										162 cm		149.5 cm		39.3		41.5	
										70 cm		21.76 kg					
										70 cm		22.35 kg					

\*L= Left, R=Right, H=Horn, B=Base, RW=Rowland Ward

No trophy hunter may hunt unless accompanied by a professional hunter, master hunting guide or hunting guide.

must be kept on the person of the permit-holder at all times while hunting.

Reported to Kivundu, 12/8 and 12/8.

KENNETH (b) (6) SHIVES  
(b) (6)  
PRINCETON, NJ (b) (6)

10-2/220

(b) (6)

DATE 4/16/2018

PAY TO THE ORDER OF US Fish & Wildlife Service  
One hundred and no/100

\$ 100.00

DOLLARS



Security Features  
Available  
Online and In-Store

HSBC   
Premier

MEMO

(b) (6)

*[Signature]*

MP

SPECIALTY ONLY





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

OMB No 1018-0164  
Expires 11/30/2016

**Federal Fish and Wildlife Permit Application Form**

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

**Type of Activity:**

**Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

RCVD FEB 21 2018

LB

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

A. Complete if applying as an individual			
1.a. Last name Link	1.b. First name Jay	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Occupation (b) (6)		
4. Affiliation/ Doing business as (see instructions) (b) (6)			5.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		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. P (b) (6)					
1.b. City Wascott	1.c. State WI	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province USA	1.f. Country USA	
2.a. (b) (6) contact person if applicable)					
2.b. City Minong	2.c. State WI	2.d. Zip code/Postal code: (b) (6)	2.e. County/Province	2.f. Country	

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter (b) (6) Chapter 1 of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature of applicant/person responsible for permit (No photocopied or stamped signatures) <i>Jay Link</i> Date of signature (mm/dd/yyyy) <i>2-14-18</i>	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 2 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: *Area between Selous and Lunda Tanzania*
- b. Date wildlife was hunted: *July 18th 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/Hide, 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 document]:  
*Selous Game Reserve, Dar Es Salaam, 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 appear on the face of the export permit].

Name: Business *Ahmed Huzel*  
Name: Address: *MKWAWA*  
Address: *Selous Game Reserve*  
City: *Dar es Salaam*  
State/Province: *Tanzania*  
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: \_\_\_\_\_

Date: 2-14-18

*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 proposed activity. While the Service will attempt to assist where possible, 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 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):

Link's Wild Safaris  
701 Houston Street  
Minung, WI 54855  
Attn: Tommy

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):

Tommy Thompson  
(715) 558-8116  
Tommy@linkswildsafaris.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.

FOR SECURITY PURPOSES, THE FACE OF THIS DOCUMENT CONTAINS A TWO-TONED COLORED BACKGROUND AND MICROPRINTING IN THE BORDER



Link's Wild Safaris  
PO Box 210  
Minong, WI 54859  
(715) 466-5333

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(b) (4)

2/14/2018

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US Fish & Wildlife

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AUTHORIZED SIGNATURE

MEMO

SECURITY FEATURES INCLUDED. DETAILS ON BACK

(b) (4)





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

OMB No. 1018-0164  
Expires 11/30/2016

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 of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

RCVD FEB 21 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 Link	1.b. First name Kenia	1.c. Initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	4. Affiliation/ Doing business as (see instructions)		
5.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		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 #, use P.O. Box)			
1.b. City Wascott	1.c. State WI	1.e. Zip code (b) (6)	1.f. Country USA
2.a. Contact person (last name, first name, and title) (b) (6) contact person if applicable			
2.b. City Minong	2.c. State WI	2.d. Zip code/Postal code (b) (6)	2.f. Country

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. (b) (6) I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.	
Signature of applicant/person responsible for permit (No photocopied or stamped signatures) Kenia (b) (6)	Date of signature (mm/dd/yyyy) 2-14-18

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: *Area between Selous and Lunda Tanzania.*
- b. Date wildlife was hunted: *July 18th 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/Hide, 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 document]:  
*Selous Game Reserve, Dar es Salaam, 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 appear on the face of the export permit].

Name: Business *Ahmed Huwel*  
Name: Address: *MKWAWA*  
Address: *Selous Game Reserve*  
City: *Dar es Salaam*  
State/Province: *Tanzania*  
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one 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.*

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 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):

Link's Wild Safaris  
701 Houston Street  
Minong WI 54859

ATTN: Tommy

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):

Tommy Thompson

(715) 558-8116

Tommy@linkswildsafaris.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.



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Link's Wild Safaris  
PO Box 210  
Minong, WI 54859  
(715) 466-5333

National Bank of Commerce  
79-2918

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2/14/2018

TO THE  
ORDER OF

US Fish & Wildlife

\$ \*\*100.00

DOLLARS

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US Fish & Wildlife

A handwritten signature in black ink that reads "Jay K. Link".  
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AUTHORIZED SIGNATURE

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SECURITY FEATURES INCLUDED. DETAILS ON BACK



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

OMB No. 1018-0164  
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

RCVD FEB 21 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 of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros

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 <b>FEJES</b>	1.b. First name <b>MICHAEL</b>	1.c. Middle name or initial <b>(b) (6)</b>	1.d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Occupation	4. Affiliation/ Doing business as (see instructions)	
5.a. Telephone number <b>(b) (6)</b>	5.b. Alternate telephone number	5.c. Fax number	5.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		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>(b) (6)</b>					
1.b. City <b>JUNIPER HILLS</b>	1.c. State <b>CA</b>	1.d. Zip code/Postal code: <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>	
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 WILDLIFESERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: <u>1</u> No <input type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.   Signature of applicant/person responsible for permit (No photocopied or stamped signatures)
Date of signature (mm/dd/yyyy) <b>2-12-2018</b>	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: N/A (Import is limited to two per hunter per calendar year)  
**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: N/A (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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: Dec. 2017

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

SKIN, SKULL

3. IF THE ANIMAL IS DEAD, please enter the following:

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

TANZANIA, AFRICA, NORTH EAST REGION

- b. Date wildlife was hunted:

12-25-2017

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

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 document]:

TANZANIA, AFRICA

AFRICAN BUFFALO SAFARIS TRACKERS

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 appear on the face of the export permit].

Name: Business AFRICAN BUFFALO SAFARI TRACKERS

Name: Address: P.O. BOX 22758.

Address:

City: DAR ES SALAAM

State/Province: TANZANIA

Country, Postal Code: TANZANIA, AFRICA, 255 27 250 7496

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: Mike Fejes Date: 2-12-18

*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.*

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 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):

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 any questions about the application? (Include name, phone number and email):

MIKE FEJES

(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.





# CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

## IMPORT PERMIT

Page 1 of 1

1. Original Permit/Certificate No.

15US72112B/9

2. Valid

08/16/2016

## 3. Permittee (name and address, country)

MICHAEL (b) FEJES

(b) (6)

JUNIPER HILLS, CA (b)

U.S.A. (6)

## 4. Consignee (name and address, country)

CHIFUTI SAFARIS

733 IONA CLOSE

BORROWDALE

HARARE

ZIMBABWE

## 5. Special Conditions

MUST COMPLY WITH ATTACHED GENERAL PERMIT CONDITIONS

SPECIMEN MAY NOT BE SOLD OR TRANSFERRED FOR ANY FINANCIAL REMUNERATION.

U.S. THREATENED SPECIES [50 CFR 17.40(f)]

MUST IMPORT THROUGH A DESIGNATED PORT LISTED IN CONDITION 10 PERMITTEE MAY ONLY IMPORT TWO LEOPARD TROPHIES PER CALENDAR YEAR.

EACH LEOPARD SKIN MUST HAVE SELF-LOCKING TAG ATTACHED TO IT WHICH INDICATES THE STATE OF EXPORT, THE NUMBER OF THE SPECIMEN IN RELATION TO THE ANNUAL QUOTA, AND THE CALENDAR YEAR TO WHICH THE QUOTA APPLIES THE EXPORT PERMIT (OR RE-EXPORT CERTIFICATE) MUST CONTAIN THE TAGGING INFORMATION AS OUTLINED ABOVE.

TROPHY MUST HAVE BEEN TAKEN DURING 2015 HUNTING SEASON.

*-May not be used for commercial purposes. For live animals, only valid if the transport conditions comply with the CITES Guidelines for Transport of Live Animals or, in the case of air transport, with IATA Live Animals Regulations.*

## 5a. Purpose of Transaction

H

## 6. U.S. Management Authority

U.S. FISH AND WILDLIFE SERVICE  
DIVISION OF MANAGEMENT AUTHORITY  
BRANCH OF PERMITS, MS-1A  
5275 LEESBURG PIKE  
FALLS CHURCH VA 22041-3803

U.S. CITES  
Management Authority

08/17/2015

Issuing Date

United States Management Authority

AUTHORITY: Endangered Species Act of 1973 (16 USC 1531 et. seq.)

## 7/8. Common Name and Scientific name (genus and species) of Animal or Plant

## 9. Description of Part or Derivative, including identifying marks or numbers (age/sex if live)

## 10. Appendix No. and Source

## A. Common Name

LEOPARD

## Scientific Name

PANTHERA  
PARDUS

9. IMPORT PERSONAL SPORT HUNTED TROPHY  
(shipment may contain bones, claws, hide, skull, teeth, or any taxidermied part, as well as worked, manufactured, or handicraft items such as curios or jewelry, that must accompany raw or tanned parts.)

10. I W

11. Quantity (including units)

1

NO

12. Country of Origin  
ZIMBABWE

## B. Common Name

## Scientific Name

9. [Redacted]

10. [Redacted]

11. Quantity (including units)

12. Country of Origin

## C. Common Name

## Scientific Name

9. [Redacted]

10. [Redacted]

11. Quantity (including units)

12. Country of Origin

## D. Common Name

## Scientific Name

9. [Redacted]

10. [Redacted]

11. Quantity (including units)

12. Country of Origin

## E. Common Name

## Scientific Name

9. [Redacted]

10. [Redacted]

11. Quantity (including units)

12. Country of Origin



THIS MULTI-TONE AREA OF THE DOCUMENT CHANGES COLOR GRADUALLY AND EVENLY FROM DARK TO LIGHT WITH DARKER AREAS BOTH TOP AND BOTTOM



CASHIER'S CHECK

(b) (6)

(b) (6)

(b) (6)

10000

One Hundred Dollars And No Cents

February 13, 2018

Y TO THE ORDER OF \*\*\*\*\* US Fish & Wildlife \*\*\*\*\*

\$ \*\*\*\*\*100.00

MITTER: Mike Fejes

  
(AUTHORIZED SIGNATURE)

M 00255-T3 (08/23/2003)

Overlay ID 00247-T3 (08/2007)

(b) (6)



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 MAR 22 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 of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros

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 <b>Benben</b>	1 b. First name <b>Michael</b>	1 c. Middle name or initial <b>(b) (6)</b>	1 d. Suffix
2 Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3 Social Security No. <b>(b) (6)</b>	4. Occupation <b>(b) (6)</b>	5 Affiliation/ Doing business as (see instructions) <b>N/A</b>
6 a. Telephone number <b>(b) (6)</b>	6 b. Alternate telephone number <b>(b) (6)</b>	6 c. Fax number <b>(b) (6)</b>	6 d. E-mail address <b>(b) (6)</b>

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

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

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in Instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: <b>from 1989- don't know number</b> No <input type="checkbox"/>
3.	Certification I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter 1 of Chapter 1 of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <b>3/14/2018</b> 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 OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**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 were 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:** The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. 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: ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: \_\_\_\_\_ (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: 1 (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:

- Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild: Zimbabwe, Matabeleland South, Buby Valley Conservancy, Beit Bridge (nearest town)
- Date wildlife is to be hunted:  
May 20, 2018 thru June 4, 2018
- Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).  
skull, Tusks and skin

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild:  
N/A
- 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):

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

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 appear on the face of the export permit].

Name: Mazunga Safaris

Business Name:

Address: 8 Norfolk Road Hillside

Address:

City: Bulawayo

State/Province: Zimbabwe

Country, Postal Code: Africa

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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:                     

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: 3/14/2018

*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.*

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).

Port - Chicago, IL USA

Contact Mike Lewis @ Coppersmith Inc. 760 Bonnie Lane  
Elk Grove Village, IL 60007 Phone: 847-437-1500 Ext 220

9. 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):

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 (b) Benben cell: (b) (6)  
email: (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.







Dziwulski, Kara &lt;kara\_dziwulski@fws.gov&gt;

**[EXTERNAL] USF&WL letter - Benben - Page 1.pdf**

2 messages

**Michael** (b) (6)

Wed, Aug 22, 2018 at 9:08 AM

To: Kara\_dziwulski@fws.gov

Good morning Kara,

Thank you for calling me back the other day. I've enclosed the first page of a letter from my elephant hunt in Zimbabwe (more documentation to acquire CITIES).

The second page will be in a second Email as I can't figure out how to get both attachments in one Email.

Please let me know that you've received both Emails.

Thank you,

Michael (b) Benben

(b) (6)

(6)

)

**2 attachments****USF&WL letter - Benben - Page 1.pdf**

2910K

**ATT00001**

1K

**Michael** (b) (6)

Tue, Oct 9, 2018 at 7:39 AM

To: Kara\_dziwulski@fws.gov

Good morning Kara

File #830 88C

I'm just following up on the status of my Elephant CITIES permit. Hopefully the 2 page letter from The BUBYE VALLEY CONSERVANCY helped my case.

I'm currently holding up my Africa shipment waiting on the Elephant CITIES.

Sitting on pins and needles!

Thanks so much,

Michael (b) Benben

(b) (6)

(b) (6)

(6)

Sent from my iPhone

[Quoted text hidden]

&gt; &lt;USF&amp;WL letter - Benben - Page 1.pdf&gt;

&gt;

&gt;

&gt;

&gt; Sent from my iPhone



## MAZUNGA SAFARIS

BUBYE VALLEY CONSERVANCY

P.O. Box 9169  
Hillside  
Bulawayo  
Phone: +263 9 241425  
Email: mazunga@yoafrica.com

P.O. Box 246  
Beit Bridge  
Cell: +263 772 78 512  
Email: mazunga@mazsaf.com

12<sup>th</sup> August 2018

US Fish & Wildlife Authorities.

To Whom it May Concern.

### **Benefits of Elephant Hunting : Buby Valley Conservancy , Zimbabwe**

The Buby Valley Conservancy (BVC) is one of the most amazing conservation successes of recent times. Up until the 1990s this former cattle ranching area had systematically eradicated wildlife for competing with, transmitting disease to, and preying on the livestock. However, BVC is now dedicated to conservation; and since its formation only 23 years ago, currently boasts one of the world's largest black rhino populations, Zimbabwe's largest lion population, and a flourishing elephant population of an estimated 700 +.

The 3,440 km<sup>2</sup> conservancy is situated in the lowveld region of southern Zimbabwe. Although the annual rainfall is low, BVC represents a high nutrient ecosystem that supports large numbers of medium sized herbivores, and as a result, high densities of predators can potentially be sustained. Although the entire conservancy is surrounded by an electrified game fence, to prevent human / wildlife conflict, there is still an annual influx of elephant from the surrounding Communal Lands as the electrics are only on the inner side of the fence – i.e. designed to control animals that are inside the conservancy. The elephant that 'break-in' are predominantly young bulls that have been harassed by dogs and villagers that live around the conservancy boundaries. This continual influx of elephant bulls over the years has resulted in a sex skew in the BVC elephant population, with bias towards young bulls.

To help address this we apply for a small quota of N/T elephant bulls annually – animals with less than 25 lbs aside. The BVC policy insists that only lone bulls are hunted to negate any disturbance.

Unfortunately the high concentration of rhino and elephant has made BVC a magnet for poaching, with the international illegal market for ivory, rhino horn and pangolin scales at an all time high. Counter-poaching is a high risk, dangerous and demanding endeavor that requires excellent law enforcement tactics and techniques as well as the critical requirement to stay ahead of poachers, and this funded from the conservancies hunt earnings.



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

*Rec'd April 23rd  
2018  
LB*

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 of Southern  
African Leopard and Namibian Southern White  
Rhinos**

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 <b>SWICK</b>	1 b First Name <b>DOUGLAS</b>	(b) (6)	1 d Suffix
2 (b) (6)			

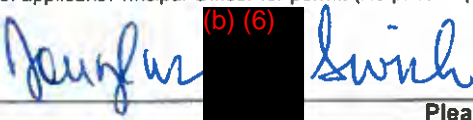
**Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution**

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 (b) (6) P.O. Boxes		1 f Country <b>USA</b>	
1 b City <b>ARGYLE</b>	1 c State <b>TEXAS</b>	(b) (6)	
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)	
 <b>04/20/2018</b>	
Please continue to next page	

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND  
NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** *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 4:** Certain hunting trophies, including leopard 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.

- Complete all questions on the application.
- Mark questions that are not applicable with "N/A".
- If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.
- 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)?

DOUGLAS (b) (6) SWICK 817-994-9436

(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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

- a. Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20.
- b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia  
Quantity:        (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).

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:

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

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

- d. 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:

WELGEMOED #248 OTJIWARONGO, NAMIBIA

- e. Date wildlife is to be hunted:

SEPTEMBER 1, 2017

f. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:  
**JOHN CILLIERS**

g. 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]:

**PRONTO GLOBAL AIR+ OCEAN FREIGHT  
B1 HIGHWAY NORTH, PLOT # 48  
BRAKWATER, WINDHOEK, NAMIBIA**

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.

a. 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 CILLIERS**  
Business Name: **OMUJEVE HUNTING SAFARIS PTY. LTD**  
Address: **FARM ONGOMBO WEST SECTION 2 NUMBER 56**  
City: **WINDHOEK**  
State/Province: **NAMIBIA**  
Country, Postal Code: **PO BOX 9456**

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

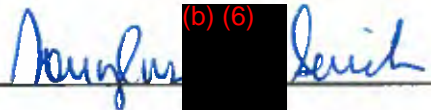
9. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

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: \_\_\_\_\_

10. 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: 04/20/2018

*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.*

11. 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).

GENUS LOGISTICS  
% MATT MAYERS  
161-15 ROCKAWAY BLVD SUITE 205  
JAMAICA NY 11434  
718-790-0216  
MATT@GENUSLOGISTICS.COM

<b>MINISTRY OF ENVIRONMENT AND TOURISM</b> Directorate Scientific Services Private Bag 13306 Windhoek, Namibia Enquiries: Chief Warden, Permit Office	PERMIT No.:	173750
	VALID FROM:	20.08.17
	VALID TO:	06.09.17

## PERMIT TO HUNT FOR TROPHIES


Permission is hereby granted in terms of the Nature Conservation Ordinance 1975 (Ord. 4 of 1975)

Name of Trophy Hunter: D. Swick

Residential Address: (b) (6) (b) (6) Argyle Texas

Country: U.S.A

to hunt the specified number of game for the sake of trophies:

 Indicates species listed on CITES Appendix I or II

	SPECIES: COMMON NAME	Number
	Buffalo	
<del>Sps I</del>	Crocodile	
	Dik-dik	
	Eland	
<del>Sps II</del>	Elephant	
	Giraffe	
	Grey Duker	
<del>Sps II</del>	Hippopotamus	
	Impala, Black-faced	
	Impala, common	
	Klipspringer	
	Kudu	
<del>Sps II</del>	Lechwe	
	Oryx (Gemsbok)	
	Ostrich	
	Red hartebeest	
	Reedbuck	
<del>Sps I</del>	Rhinoceros, black	
<del>Sps I</del>	Rhinoceros, white	
	Roan	
	Sable	
	Springbok	

	SPECIES: COMMON NAME	Number
	Steenbok	
	Warthog	
	Waterbuck	
	Wildebeest, blue	
	Zebra, Burchell's	
<del>Sps II</del>	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
<del>Sps I</del>	Cheetah	
<del>Sps I</del>	Leopard (black)	IX
<del>Sps II</del>	Lion	
	Other	
* Subject to the attached pre-kill trophy hunting regulations		
* Notify nearest MET office prior hunt		

on the following farms / hunting concessions: Okorungutu Lot # 100 of

Guided by (name of guides): Wagemund #248  
J. Alliers

Cashier receipt No.: 2148134

Issued on.....

Amount received NS\$ 186,650

R. + Hobes  
(ISSUING OFFICER'S SIGNATURE)

UNDER THE AUTHORITY OF THE MINISTER,  
POHAT  
78 (1) Authorizing officer  
IMPORTANT: This permit is not valid if altered in any way.  
OF 1975

186,650  
**NAPP (2017)**  
Official MET date stamp

197 08 17

The following certificate must be completed immediately after each animal that has been hunted (please print)

Date	Species	LH*	RH*	LB*	RB*	Total	RW*	Age	Male Female	Farm		Farm owner	Hunter	Professional hunter Master hunting guide Hunting guide
										Name	No			
01/09/2011	leopard	S	K	I	N			②	♂	Weyenroth	248	B.	Angela Smith	[Signature]
		S	K	L	L									
		Skull: W = 25 cm h = 28 cm												
<p>"We hereby individually and collectively declare that the predator recorded and photographed was hunted, shot and killed by us in full accordance with all the predator trophy hunting permit conditions".</p>														
												Angela Smith		

\*L=Left, R=Right, H=Horn, B=Base, RW=Rowland Ward

No trophy hunter may hunt unless accompanied by a professional hunter,, master hunting guide or hunting guide.

This permit must be kept on the person of the permit-holder at all times while hunting.

Only guide(s) as specified on the permit may conduct the hunt.





PRINTED ON LINEMARK PAPER - HOLD TO LIGHT TO VIEW. FOR ADDITIONAL SECURITY FEATURES SEE BACK.

PERSONAL MONEY ORDER

(b) (6)

(b) (6)

PAY TO THE ORDER OF \*\*\*U.S. FISH AND WILDLIFE\*\*\*

\*\*\*One hundred dollars and no cents\*\*\*

March 05, 2018

Payee Address:  
Memo:

(b) (6)

\*\*\*\$100.00\*\*

VOID IF OVER US \$ 100.00

*Angela Smith*  
Purchaser's Signature

(b) (6)

Security Features Included. Details on Back



RCVD APR 23 201

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 of Southern  
African Leopard and Namibian Southern White  
Rhinos

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 <b>Wehinger</b>	1.b. First Name <b>Mark</b>	1.c. Middle Name/Initial <b>(b) (6)</b>	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number		

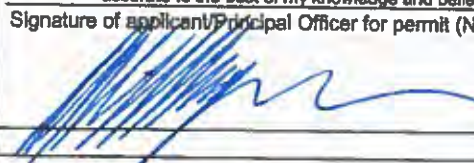
**Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution**

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>(b) (6)</b>				
1.b. City <b>Dublin</b>	1.c. State <b>Ohio</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province <b>(b) (6)</b>	1.f. Country <b>USA</b>
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)  <b>04-11-18</b>

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND  
NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** *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 4:** Certain hunting trophies, including leopard 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.

- Complete all questions on the application.
- Mark questions that are not applicable with "N/A".
- If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.
- 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)?

MARK (b) (6) Wehinger  
(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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):
- a. Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20.
  - b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia  
Quantity: 0 (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).

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 ANIMAL HAS ALREADY BEEN TAKEN, please enter the following:

- d. 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:

Nyaminga GMA Luangwa Valley

- e. Date wildlife is to be hunted: August 6, 2017



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

Paya Kakuli Safaris  
Plot 284 Bwinjimfumu Road  
P.O. Box 32502  
Lusaka, Zambia

- g. 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]:

Paya Kakuli Safaris Plot 284 Bwinjimfumu Road  
P.O. Box 32502 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.
- a. 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: Paya Kakuli Safaris  
Business Name: Paya Kakuli Safaris  
Address: Plot 284 Bwinjimfumu Road  
Address: P.O. Box 32502  
City: Lusaka  
State/Province: Zambia  
Country, Postal Code: Zambia

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. 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: \_\_\_\_\_

10. 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: 4-11-18

*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.*

11. 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).

*Please use New York, NY Port*

# REPUBLIC OF ZAMBIA

The Zambia wildlife Act  
(Act No. 12 Of 1998)

The Zambia Wildlife (Licences and fees) Regulations, 2007

LFZAWA Form 2

## NON RESIDENT HUNTING LICENCE

26292

(Regulation 3 (2))

Station of issue: Chilanga

Date of issue: 02/08/2017

### DETAILS OF LICENSEE

Full Name: Wohinger Mark

Nationality: USA

Address: Dublin, OH

Full Name of Safari company: Paya Katali

Comp. Cert. Incorporation No:

Date of incorporation:

Postal Address: Box 34948

LSA

Residential Address:

Firearm Licence/Tourist's Firearm import No: 013234 Calibre of Firearm(s): 416 / 338

Type of Hunt:

Hunting Block: Nyaminga

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 following 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\$
Leopard	1	M	Nyaminga	2017	2650
			Shot on -	06/08/2017	
			Zebra 14	13481	
			5596	PH-Chris Ficker	
				CEB	
Total Animals Fees					2650
Concession Fees					—
Grand TOTAL					2650

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

### 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

Date

02/08/2017

1775

*[Signature]*

No. 13481

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... Christopher Fisher

NRC/Passport No. 219544/23/1

Safari Company on behalf of which the Professional hunter is submitting this return: Payot & Co. Ltd.

DETAILS OF CLIENT

Full Name... Wehinger, Mark (b) (6)

NRC/Passport No. (b) (6)

Postal Address... (b) (6)

Dublin, (b) (6)

Non Resident Hunting Licence No. 18105

Date of issue 26/7/17

Name of Hunting block hunting was conducted: Nyamungu

Hunting period 01/08/2017 to 04/08/2017

GMA

Date	Species/Sex	Number Killed	Number wounded	GPS Location	Trophy for Export		Foreign currency value charged to client
					Yes	No	
	W. lebeest	1	0	S12°05'64" E032°24'58" ✓			26178 Nc
	Barbican	1	0	S12°05'64" E032°24'58" ✓			26342 Nc
	Impala	1	0	S12°09'18" E032°13'51" ✓			26183 Nc
	Leopard	1	0	S12°09'53" E032°31'42" ✓			26292 Nc

FAILS OF TROPHY MEASUREMENT

Species	Length of skin	Length of Tusk	Av. Length of Horn
Leopard	202 cm		
Impala			15"
Barbican			NA
Leopard			14 1/4" 27.5"

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 Safari Co. On behalf of the client to the DG for animals, Licences and Hunting rights		
Total Amount Paid		

Signature by (a) Client

Signature of Professional Hunter:

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.  
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 amount paid by the client for the hunt

Date:

Signatures: Client

Professional Hunter

1776  
Wildlife Police Officer

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

REPUBLIC OF ZAMBIA

THE ZAMBIA WILDLIFE ACT  
(ACT NO. 12 OF 1998)

18109

THE ZAMBIA WILDLIFE  
(LICENSES AND FEES) REGULATIONS, 2007

FORM ZAWA 7

PERMIT TO HUNT IN A GAME MANAGEMENT AREA  
(Regulation 4)

Station of issue... Chulungu Date of issue... 26/7/17

1. DETAILS OF PERMIT HOLDER

Full name Wahinga Mook (b) (6) NRC/Passport No. (b) (6)

Postal Address: Box 151 (b) (6)

Residential Address: USA

Firearm License No(s) 013234

Calibre(s) 416 338

Resident Hunting Licence - National/District (Nos.)

Bird Hunting Licence No. 19315

Is hereby authorised to hunt in Lumumba Game

Management Area, Nyamungu Hunting block

For 01/8/17 days from 01/8/17 to 14/8/17 (dates inclusive)

Fees Paid K. \$150 Receipt No.

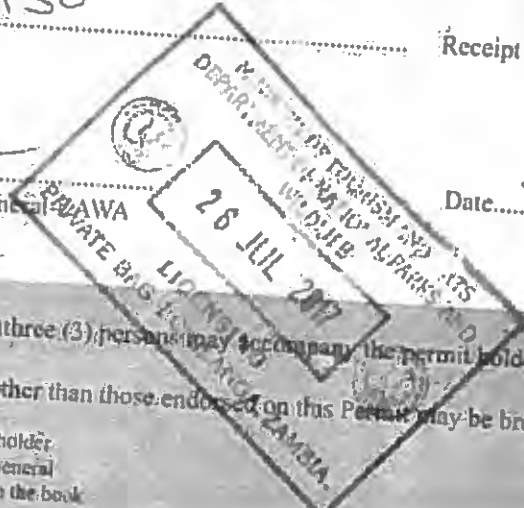
Date 26/7/17

Director General

Conditions of issue

1. Not more than three (3) persons may accompany the permit holder into the Game Management Area.
2. No firearms other than those endorsed on this Permit may be brought into the Game Management Area.

White copy to the Permit holder.  
Yellow copy to Director General  
Blue copy to be retained in the book





(b) (6)

71-65/749

(b) (6)

DATE

4/12/18

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All rights reserved. SECURITY PLUS HIGH SECURITY

PAY TO  
THE ORDER OF

US Fish and Wildlife Service \$ 100.00  
One Hundred & 00/100



First Merchants Bank  
www.firstmerchants.com

DOLLARS

Heat  
Reactive  
Ink

Blife Checking

MEMO

(b) (6)

(b) (6)

FEATURES INCLUDING THE SECURITY SQUARE AND HEAT-REACTIVE INK. DETAILS ON BACK.



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

OMB No. 1018-0164  
Expires 11/30/2016

**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 of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

RCVD MAR 26 2018

LB

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

<b>A. Complete if applying as an individual</b>			
1 a. Last name Hardman	1 b. First name Paul	1 c. Middle name or initial (b) (6)	1 d. Suffix —
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Occupation (b) (6)		
4. Affiliation/ Doing business as (see instructions)			
5 a. Telephone number (b) (6)	5 b. Alternate telephone number (b) (6)	5 c. Fax number (b) (6)	5 d. E-mail address (b) (6)

<b>B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution</b>			
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

<b>C. All applicants complete address information</b>					
1 a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes) (b) (6)					
1 b. City Lehi	1 c. State Utah	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	

<b>D. All applicants MUST complete</b>	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – <i>attach documentation of fee exempt status as outlined in instructions.</i> (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge. (b) (6) I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature of applicant responsible for permit (No photocopied or stamped signatures) <u>Paul Hardman</u> Date of signature (mm/dd/yyyy) <u>02-10-2018</u>	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: 1 (Import is limited to two per hunter per calendar year)  
**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: na (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: *Leopard - 3-3-17 - 3-18-17*
- b. Date wildlife was hunted: *Elephant - 11-7-2016 - 11-21-2016 -*  
*Elephant - Mangetti Park - Windhoek Namibia*
- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks): *Leopard - Okavango Ptn 4 #58 - Windhoek Namibia*

leopard-life size mount      elephant-skin,skull,tusks,shoulder 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 document]:

*The Yellow Shark Holdings (pty) Ltd.*

*PO BOX 81413*

*Olympia, Windhoek*

*Republic of Namibia, Namibia*

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 appear on the face of the export permit].

Name: Business      The Yellow Shark Holdings (pty) Ltd.  
Name: Address:      po box 81413  
Address:  
City:      Olympia-Windhoek,  
State/Province:      Republic of Namibia  
Country, Postal Code:      Namibia

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: \_\_\_\_\_

*Paul* (b) (6) *Hardman*

Date: *Feb. 18, 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.*

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 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):

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):

Paul Hardman (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.



Paul (b) (6) Hardman  
(b) (6) (6)  
97-32/1243 No. (b) (6)  
DATE 3-15-18  
Pay to the order of US Fish & Wildlife Service \$ 100.00  
One hundred and 00/100  
Lehi Office  
**Central Bank**  
475 East Main Street 766-3886  
Lehi, Utah 84043  
MP  
(b) (6)



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 of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros

RCUD MAR 27 2018

LB

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

A. Complete if applying as an individual			
1.a. Last name Newcombe	1.b. First name Arthur	1.c. (b) (6) or initial	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) (b) (6)	3. Social Security Number (b) (6)	5. Affiliation/Doing business as (see instructions) N/A	
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. (b) (6) (Include apartment, suite, or room #; no P.O. Boxes)			
1.b. City South Miami	1.c. State FL	1.d. (b) (6)	1.f. Country U.S.
2. (b) (6) (Include name of contact person if applicable)			
2.b. City Miami	2.c. State FL	2.d. (b) (6)	2.f. Country 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 <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. 
Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) _____ Date of signature (mm/dd/yyyy) _____	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**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 were 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:** The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity:        (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity:        (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

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, horns, tusks).~~

3. **IF THE ANIMAL IS DEAD**, please enter the following:

a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: Mozambique / TETE Province / District Chifunde  
Chiridzi CONCESSION COORDINATES 15 27.91 / 33 54 12.

b. Date wildlife was hunted: 1 SEPT. 2015

- 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, skull, claw s, skin, floating bone

- 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]:

Unit 6 Aurens Industrial Estate 6 Honda Street Aurens, Randfontein, Gauteng, 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 appear on the face of the export permit].

Name: Winnie Winnie da Costa  
Business Name: Window of Africa  
Address: Unit 6 Aurens Industrial Estate  
Address:  
City: Aurens - Randfontein  
State/Province: Gauteng  
Country, Postal Code: Republic of South Africa 1759

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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 ATTACHED INFO + Photos  
**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: 2/20/18

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.



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).

MIAMI 5206

9. 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):

Art Newcombe

(b) (6)

MIAMI, FL

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):

Arthur Newcombe

(b) (6)

(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.



#5

Graham Cawood- Niassaland Safari's Mozambique

33% of the Government licenses went back directly into the surrounding local communities

60% of trophy fee went directly into running costs of management of the area from camp wages, road maintenance and anti- poaching \$50,000.00 is spent by the company on Anti- Poaching alone. The income from the Leopard plays a very important part towards the costs of the anti- poaching. Poachers use snares and gin traps to kill Leopards (see photos). The anti- poaching team is on the ground every day combating all forms of poaching.

Two pages of photos follow

mailing Address For  
Window of Africa  
Postnet Suite #1016  
Private Bag X10  
Fourways North  
Gauteng  
R. S. A.  
2086



Home made Rifles Seized  
by Anti Poaching Detail



Anti Poaching Detail





Seizure of Home made  
leg hold Traps by Anti-  
Poaching Detail

ART NEWCOMBE

2/20/2018 DATE

(b) (6)

PAY TO THE ORDER OF U.S. Fish & Wildlife Service \$100

ONE hundred dollars no/cent DOLLARS

SPACE COAST CREDIT UNION

Banking that protects your future now.

Virginia Beach, VA 23186

(b) (6)

Photo Safe Deposit®  
Lends on hand



Department of Interior  
U.S. Fish and Wildlife Service

# Federal Fish and Wildlife Permit Application Form

Type of Activity

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

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

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 <b>OLIVER</b>	1.b. First Name <b>ROBERT</b>	1.c. Middle Name/Initial <b>(b) (6)</b>	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address <b>(b) (6)</b>

## 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. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes) <b>(b) (6)</b>				
1.a. City	1.b. State	1.c. Zip code/Postal code	1.e. County/Province	1.f. Country
<b>TERREBONE</b>	<b>OR</b>	<b>(b) (6)</b>		<b>USA</b>
2.a. Mailing address (include if different than physical address, include name of contact person) <b>(b) (6)</b>				
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 – <i>attach documentation of fee exempt status as outlined in instructions.</i> [50 CFR 13.11(d)]
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in <i>Title 50 Part 13 of the Code of Federal Regulations</i> and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)
<b>(b) (6)</b>
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 RIETERS 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 FROM RIETERS 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:  (b) (6) 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) Terrebonne, OR (b) (6) 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

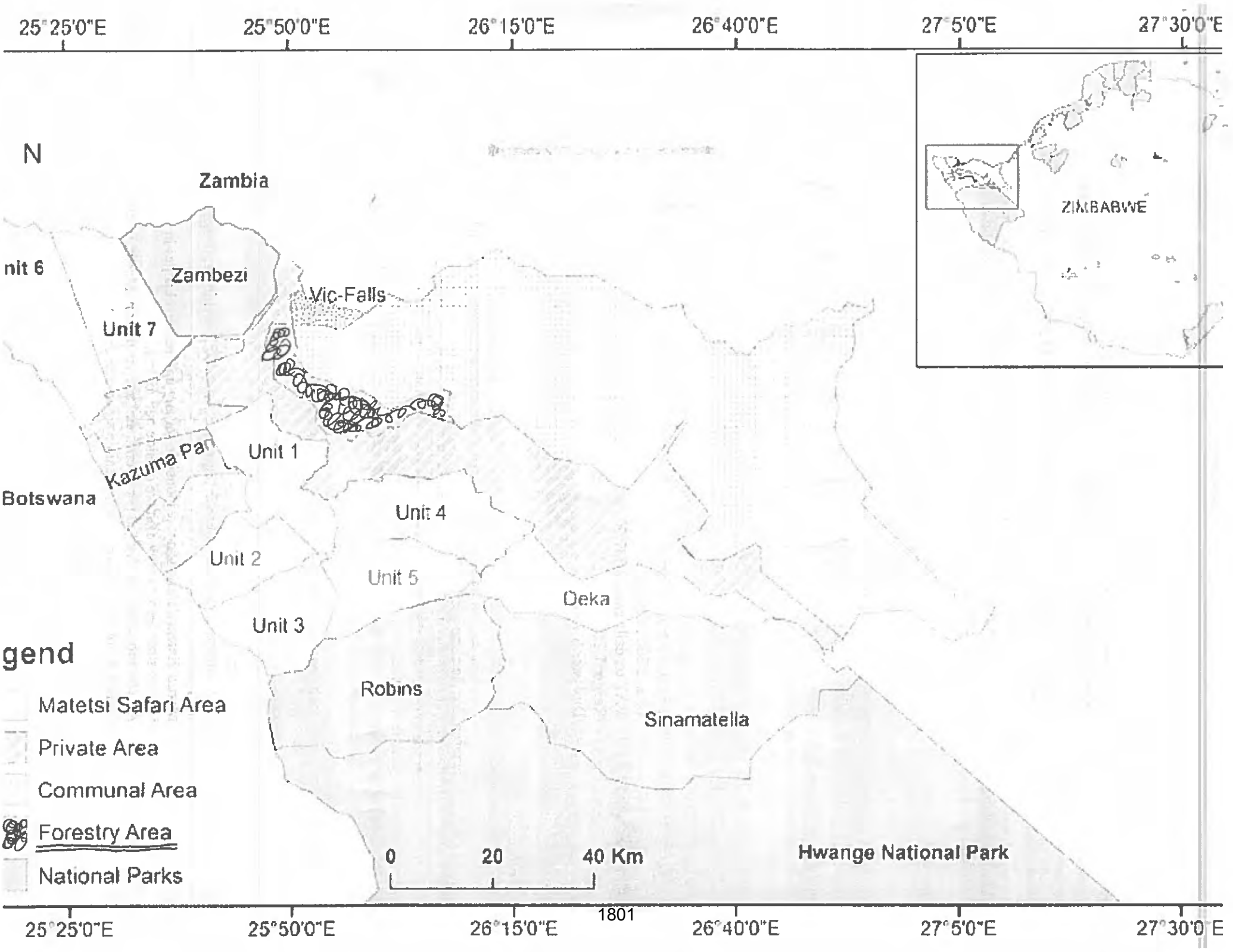
#### **Cancellation Policy**

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.



ROBERT (b) (6) OLIVER  
(b) (6) (b) (6)  
TENNESSEE, OR (b) (6)

(b) (6)

03-22-2018  
Date

Pay to the Order of U.S. Fish & Wildlife Service  
One Hundred AND NO/100

\$ 100.00

Dollars



Security  
Features  
Shown on  
Back

WELLS  
FARGO

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

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Application For Form 3-200-70  
(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 of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

RCVD FEB 28 2018

LB

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

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

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

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

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001	
Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) 	Date of signature (mm/dd/yyyy) Feb 20 2018

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**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 were 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:** The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: <sup>1</sup> \_\_\_\_\_ (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

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, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: NAMIBIA, OTJOZONDJUPA REGION, ERUNDU #136, S 52 39 26 E 16 27 17
- b. Date wildlife was hunted:  
09/19/2017

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

SKULL & JAW, FULL MOUNT, 2X FLOATING BONES, 2X DEW 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 document]:

THE YELLOW SHARK HOLDINGS  
DANTE STREET, WINDMILL PARK UNIT 7  
WINDHOEK, NAMIBIA

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 appear on the face of the export permit].

Name: ANTON ESTERHUIZEN  
Business Name: PO BOX 1059  
Address: 9000 OTJIWARONGO  
Address: NAMIBIA  
City:  
State/Province:  
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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: Feb 20 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.*

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 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):
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):  
NICHOLAS LILLIOS (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.



(b) (6)

2/20/18 DATE

PAY TO THE ORDER OF US Fish and Wildlife Service

One hundred

\$ 100<sup>00</sup>

DOLLARS

Security features included. Details on back.

CAPITAL MARK  
BANK & TRUST  
A Division of Fidelity Bank

MEMO Permit Application

(b) (6)





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 28 2018

LB

Return to: U.S. Fish and Wildlife Service  
Division of Management Authority (DMA)  
Branch of Permits, MS: 1A  
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 <b>House</b>	1 b. First name <b>Jason</b>	1 c. Middle name or initial <b>(b) (6)</b>	1 d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Social Security No. <b>(b) (6)</b>	4. Occupation <b>(b) (6)</b>	5. Affiliation/ Doing business as (see instructions)
6 a. Telephone number <b>(b) (6)</b>	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		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>(b) (6)</b>			
1 b. City <b>Reno</b>	1 c. State <b>NV</b>	1 d. Zip code/Postal code <b>(b) (6)</b>	1 e. Country <b>U.S.A.</b>
2 a. Mailing Address (include if different than physical address, include name of contact person if applicable)			
2 b. City	2 c. State	2 d. Zip code/Postal code	2 e. County/Province
2 f. Country			

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief, and that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <b>(b) (6)</b> <b>Jason House</b> Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures)	
Date of signature (mm/dd/yyyy) <b>02/08/2018</b>	

Please continue to next page

## 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 (3-200-32, <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.

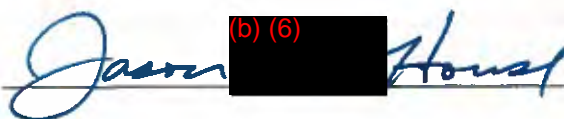
I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I 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: \_\_\_\_\_

 (b)(6)

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).

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):

Houston Texas

Tyson 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):

Tyson 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

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(b) (6)

Jason A. S. House

MP

Harland Clarke





# 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 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 Zimbabwe.

#### 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), Chimanmani, 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 loss 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<sup>2</sup> of land where some form of wildlife based land use is practiced in Zimbabwe. Lions occur permanently in 45% of this available range (c. 145,000km<sup>2</sup>), 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<sup>2</sup> 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<sup>2</sup> 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 Bulyebe) 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<sup>2</sup> 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 13<sup>th</sup> 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<sup>2</sup> 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  $0.3 \pm 0.1/100 \text{ km}^2$  for female lions; during the same period, actual offtake was lower at  $0.08 \pm 0.1/100 \text{ km}^2$ , 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 to ZPWMA'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<sup>2</sup>; the 2015 offtake would have accounted for 0.125 lions/1,000 km<sup>2</sup>.



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. 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 (b) (6) House of Reno, Nevada.

 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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**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

  
CHIEF, BRANCH OF PERMITS, DMA

**Permittee:**

JASON (b) HOUSE  
(b) (6) (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).



**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.

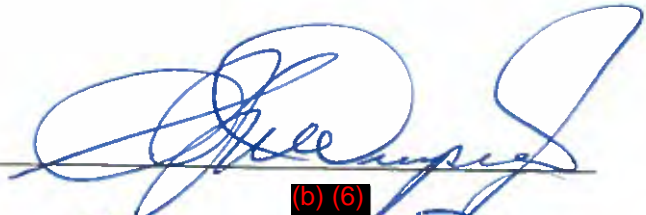
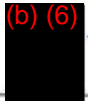
I also request that Conservation Force be copied with all correspondence, acknowledgements, notices, and decisions concerning my application to import my trophy at the following address:

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](mailto:cf@conservationforce.org)

Signed: \_\_\_\_\_

Name: \_\_\_\_\_

Date: \_\_\_\_\_

  
Name: Steven  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)

RCVD FEB 28 2018

LB

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

A. Complete if applying as an individual					
1.a. Last name <b>Dupuis</b>	1.b. First name <b>Steven</b>	1.c. Middle name or initial <b>(b) (6)</b>	1.d. Suffix <b>(b) (6)</b>	1.e. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>		3. Social Security No. <b>(b) (6)</b>		4. Occupation <b>(b) (6)</b>	
5. Affiliation/Doing business as (see instructions) <b>(b) (6)</b>		6. a. <b>(b) (6)</b>			

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>(b) (6)</b>					
1.b. City <b>Lafayette</b>	1.c. State <b>La.</b>	1.d. Zip code/Postal code: <b>(b) (6)</b>	1.e. County/Province <b>(b) (6)</b>	1.f. Country <b>U.S.A.</b>	
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) <b>Same</b>					
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country	

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: <b>Unavailable</b> No <input type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.
Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) <b>[Signature]</b>	
Date of signature (mm/dd/yyyy) <b>02/21/18</b>	

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:
- Scientific name (genus, species, and, if applicable, subspecies) and common name.

*P.T. Melanochaita (African Lion)*

- Sex (if known).

*Male*

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:

- 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 Petauk game management areas, Nyimba being the closest town operator and lease holders Nyamvu and Mopane Safaris*

- Date wildlife is to be hunted:

*May 7th 2018 Thru May 28th 2018*

- 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:

- 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*

- 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:

Business Name:

Address:

Address:

City:

State/Province:

Country, Postal Code:

Bridge Shipping Zambia Limited  
Villa Park, Plot 177/178 Unit C3  
Luanshya, Road,  
Lusaka, Zambia.  
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@conservation!*

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.



84-487  
1111

## CASHIER'S CHECK

DATE 02/22/2018

ISSUING REGION 081

BRANCH W. Congress

BRANCH DID 41243

ONE HUNDRED DOLLARS AND 00 CENTS

PAY TO THE ORDER 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 issuance 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>

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Steven Dupuis PRT #78597C

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Steve Dupuis (b) (6)  
To: "Barry, Anna" <anna\_barry@fws.gov>

Wed, Apr 11, 2018 at 5:52 PM

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 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 17<sup>th</sup> 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<sup>2</sup> of wildlife area (average 189 km<sup>2</sup> 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<sup>2</sup> (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<sup>2</sup> (approximately 10,000 km<sup>2</sup> 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<sup>2</sup> (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 of 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 unsustainable 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 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 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 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 undertaken 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): 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. Dupuis.

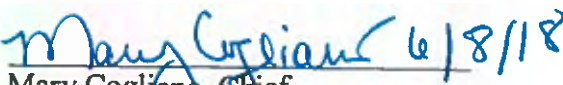
Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to him to successfully accomplish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

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

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USFWS (2015). Final ESA listing rule for *Panthera leo leo* and *P. l. melanochaita*. 80 Fed. Reg. 79999.

Zambia Department of National Parks and Wildlife (DNPW). May, 5th, 2016. Enhancement and Non-Detriment Finding for African Lion sport Hunting in Zambia Completed by the Department of National P Parks and Wildlife (DNPW).



**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 Coglian*  
CHIEF, BRANCH OF PERMITS, DMA

**Permittee:**

STEVEN (b) (6) DUPUIS (b) (6)  
(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).



\$100

RCVD MAR 30 2018

Handwritten mark

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 OF BONTEBOK  
TROPHIES FROM SOUTH AFRICA**

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 <b>DITTO</b>	1.b. First Name <b>Roger</b>	1.c. Middle Name Initial <b>(b) (6)</b>	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number	3.a. Alternate Telephone Number	4. <b>(b) (6)</b>

**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>(b) (6)</b>				
1.b. City <b>SNYHANISH</b>	1.c. State <b>WA</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. Country/Province	1.f. Country <b>USA</b>
2.a. Mailing address (include if different than physical address; include name of company, if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. Country/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>(b) (6)</b>

Please continue to next page



**IMPORT OF SPORT-HUNTED BONTBOK TROPHIES from South Africa**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** The bontebok is listed as endangered under the Endangered Species Act. Applications for endangered species permits must be published in the Federal Register for a 30-day public comment period. Allow at least 90 days for the application to be processed.

**Note 4:** This application can only be used if you have hunted/will be hunting in South Africa. If you have or will be hunting in a different country, please use form 3-200-20

**Note 5:** 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:
  - 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;
  - 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
  - The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

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.

(b) (6)

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

(b) (6)

Robert D. TITO,

(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. How many Bontebok (*Damaliscus pygargus pygargus*) are you applying to import? Quantity: 1
- a. At the time of the application, the specimen(s) is:
- Alive ☐ Dead ☒
- b. What is the approximate date of proposed take? \_\_\_\_\_
- c. What is the date you took the animal? 23 JULY 2017
- 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]:  
TRUE RESOLUTION TAXIDERMY P.O. BOX 305  
ROCKWOLD PRIVATE GAME RESERVE GRAHAMSTOWN 6140  
SOUTH AFRICA
5. ENTER the name and address of the landowner on whose property the bontebok was or will be taken:
- Owners name: FRANK BAUKEN  
 Farm Name: THORN KLOOF  
 District: \_\_\_\_\_  
 Address: PO BOX 442  
 City: GRAHAMSTOWN 6140  
 State/Province: REPUBLIC OF SOUTH AFRICA  
 Country, Postal Code: \_\_\_\_\_
- Please be aware that the bontebok is listed in Appendix II of CITES. As such, you must obtain a CITES export permit from South Africa. If you are not exporting the trophy from South Africa directly to the United States, you will need to obtain a CITES Re-export certificate from the re-exporting country.
6. Attach a signed statement from the landowner giving you permission to cull a bontebok from their captive herd.
7. If available, provide a copy of the landowner's Certification of Registration for the bontebok herd. (Note: this is not a copy of the export permit or certificate issued by a South African province.) In order to meet the criteria for a permit under the Endangered Species Act, the bontebok must be culled from a ranch that has been certified by the Government of South Africa under their bontebok program. If the ranch is not registered, we may be unable to issue an import permit.

8. **Complete name and address of overseas person or business shipping the trophy to you (this name will appear on the face of the permit).**

Name: CHARL LE ROUX  
Business Name: TRUE REFLECTION TAXIDERMY  
Address: PO BOX 305  
City: GRAHAMSTOWN 6140  
State/Province: SOUTH AFRICA  
Country, Postal Code:

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. **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).

Taxidermist/Broker's signature: \_\_\_\_\_ Date: \_\_\_\_\_

10. **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).

Applicant's signature:  (b) (6) Date: 3-26-2018

*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 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).

FRANK BOWKER  
THORN KLOOF  
P.O. BOX 442,  
GRAHAMSTOWN  
6140  
REPUBLIC OF SOUTH AFRICA  
  
Tel +27829403779  
Email [info@bowkersafaris.co.za](mailto:info@bowkersafaris.co.za)

TO WHOM IT MAY CONCERN

I, Frank Bowker, of Thorn Kloof, Grahamstown hereby grant permission to  
Mr Roger Ditto of (b) (6) Snohomish, WA (b) (6) to  
shoot one Male bontebok out of my private herd. I remove old, surplus males in this manner.



F.W.M. BOWKER

VAN DIE KAAP DIE GOETE HOOP

TAK ALGEMENE PROVINSIALE DIENSTE  
HOOFDIREKTORAAT  
NATUUR- EN ONGEWINSBEWARING

PROVINSIALE GEDOU. DOHPSTHAAT  
PRIVAATSAK X9086, KAAPSTAD, 8000

TELEFAXS: (021) 23-0939, TELEGRAM: NATUUR  
TELEKS: 522368

Mr F Bowker  
Thornkloof  
P O Box 442  
GRAHAMSTOWN  
6140



PROVINCIAL ADMINISTRATION  
OF THE CAPE OF GOOD HOPE

GENERAL PROVINCIAL SERVICES BRANCH  
CHIEF DIRECTORATE  
NATURE AND ENVIRONMENTAL CONSERVATION

PROVINCIAL BUILDING, CORP STREET  
PRIVATE BAG X9086, CAPE TOWN, 8000

TELEFAX: (021) 23-0939, TELEGRAM: NATU  
TELEX: 522368

TELEPHONE  
TELEPHONE (021) 483-4098

ADMINISTRATIVE  
ENQUIRIES J F JOOSTE

VERWYSING  
REFERENCE AND 1/31

DATED  
DATE 14 August 1990

Dear Mr Bowker

REGISTRATION OF BONTEBOK HERDS

Following the inspection done on 21 April 1989 on your farm Thornkloof it is my pleasure to inform you that your bontebok herd has been registered as a pure herd. Congratulations!

Please find enclosed your registration certificate. This certificate could be extremely valuable and you should do everything possible to retain the purity of your herd. In future export permits for sport-hunted bontebok trophies and permits to capture, sell and transport bontebok will only be issued in respect of registered herds.

Periodic reinspections of registered herds will be carried out in future and it is in your own interest to ensure that no contamination of your valuable herd occurs.

Once again, congratulations and thank you for your contribution to nature conservation.

Yours faithfully

1 DIRECTOR-GENERAL

D. DE LA HARPE  
Commissioner of the  
Provincial Administration  
Private Bag X9086, Cape Town, 8000





**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 numbers and relevant expiry dates; and
  - g) Detailed packing list as per condition 7.
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 – 18:30):  
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, Waybill/s and Bill of entry/s (SAD/ DA 550) must be presented for inspection. 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 and Waybill/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. Only A person authorized thereto by the Premier or Minister may 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.

Signature of Issuing Officer  Full Name	BIODIVERSITY & CONSERVATION DEPARTMENT OF ECONOMIC DEVELOPMENT 2817 44 30 PEARL THE INCANVA EYDQWA XUS4 EXPIRITIE Data IYINKLUNG DIE PERMITE FOS-CAAP/44SKO	Signature of Recipient  Date  Full Name
---	--	---

Conditions to this permit have been issued in terms of the applicable provisions of the NEMBA, the CITES and TOPS Regulations as well as the relevant provincial legislation (where applicable).

**GAME FARM HUNTING PERMIT**

(Issued in terms of the provisions of the  
National Environmental Management  
Biodiversity Act 2004, Act 10 of 2004)

**PERMIT NUMBER: GFH 06088 B**

NAME OF ISSUING AUTHORITY	
NAME	DE DEAT
ADDRESS	PRIVATE BAG X 1000
ADDRESS	GRAHAMSTOWN
PROVINCE	E.C.

DETAILS OF HUNTER		
NAME	ROGER DITTO	ID NO.
SURNAME	DITTO	PASSPORT NO. (b) (6)
POSTAL ADDRESS		RESIDENTIAL ADDRESS
ADDRESS	(b) (6)	
ADDRESS		
TOWN	SNOHMISH	
POSTAL CODE	(b) (6)	
PROVINCE	WA	
PARTICULARS OF PROFESSIONAL HUNTER (in case of hunting client)	NAME AND SURNAME: CHARL LE ROUX	
	CONTACT NUMBER:	
	PERMIT NUMBER: 94/2015 EC	

DETAILS OF REGISTERED GAME FARM OWNER	
REGISTRATION CERTIFICATE NUMBER	30751
NAME: LANDOWNER	FRANK
SURNAME: LANDOWNER	ROUX
REGISTERED FARM NAME AND NUMBER	THORNKLOOF COM 144
FARM SIZE (ha)	3000
DISTRICT NAME	MAKANA
PROVINCE	EC

HUNTING METHOD	
HUNTING INSTRUMENT	RIFLE
HUNTING METHOD	WORK & TALK

DETAILS OF SPECIES INVOLVED			
SPECIES		SEX (if known)	QUANTITY
COMMON NAME	SCIENTIFIC NAME		
ROUTE BOK	ORNAIS PYGARS	MALE	1

DETAILS OF RESTRICTED ACTIVITIES INVOLVED	

PERMIT VALIDATION			
DURATION OF THE HUNT	FROM:	TO:	
PERIOD OF VALIDITY	FROM:	TO:	
DATE ISSUED:			
SIGNATURE OF GAME FARM OWNER:			
SIGNATURE OF HUNTER:			

NAME OF ISSUING OFFICER:	SIGNATURE OF ISSUING OFFICER:
RECEIPT NUMBER	
STAMP OF ISSUING AUTHORITY:	

N 6

PROVINSIE VAN DIE OOS KAAP

PROVINCE OF THE EASTERN CAPE

JAGLISENSIE

HUNTING LICENCE 44784

LISENSIEGELD

R20.00

LICENCE FEE

- en Omgewingsbewaring, 1994  
9 van 1974) (artikel 27)

Nature and Environmental Conservation Ordinance 1974  
(Ordinance 19 of 1974) (section 27)

**ORAAGBAAR NIE**

**NOT TRANSFERABLE**

Lisensie No. A  
Licence No.

s van die Ordonnansie op Natuur en  
, 1974 (Ordonnansie 19 van 1974),  
y uitgereik aan -

Subject to the provisions of the Nature and Environmental  
Conservation Ordinance 1974 (Ordinance 19 of 1974),  
a hunting licence is hereby issued to -

(b) (6)

rewe lisensiegeld word hierby  
ribed licence fee is hereby

19/7/17

Datumstempel /  
Date stamp

*Roger Ditto*

Lisensiehouer /  
licence holder

Bewaring / \* Ontvanger van Inkomste / \* Gernagligde Persoon /  
reservation / \* Receiver of Revenue / \* Authorised person

**VOORWAARDES**

te in werking siegs indien di deur  
n onderteken is.  
geldig vit twaalf maande vanaf die  
ing daarvan.

VAN TOEPASSING IS NIE

**CONDITIONS**

1. This licence takes effect only if it is signed by the holder thereof.
2. This licence is valid for twelve months from the date of issue thereof.

\* DELETE WHICHEVER IS NOT APPLICABLE



# SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

EC 25310

Duration of Hunt:

Commenced: 19 / 7 / 17

Terminated: 26 / 7 / 17

✓ 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)

Mpumelanga  
(MP)

Western Cape  
(WC)

Eastern Cape  
(EC) ☒

Northern Cape  
(NC)

Post Permit to (Mark correct block with X)

PROFESSIONAL HUNTER	
Name:	Charles le Roux
Business Address:	Rockwood Game Farm Box 305 Carletonville
Code:	5140
I.D. No:	350328510184
PH Permit No:	HC 9/12015 EC
Date:	20/7/17
Signature:	

CLIENT	
Name:	[REDACTED]
Permit:	[REDACTED]
Code:	[REDACTED]
Pass:	[REDACTED]
Tel:	[REDACTED]
Date:	[REDACTED]

HUNTING OUTFITTER	
Name:	Charles le Roux
Business Address:	Rockwood Game Farm Box 305
Code:	5140
I.D. No:	350328510184
Tel. No:	
Fax No:	
H.O. Permit No:	HC 9/12015 EC
Date:	20/7/17
Signature:	

Farm Name Registration No.	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate / Licence No.	Date of Hunt		Species Killed / Wounded	Number Killed or Wounded	Sex		Part of Trophy to be Exported
				From	To			♂	♀	
Eliminate	Nkombe	J Ford	44784	19/7	7	Blue Ducker	1	✓		Full mount, skull, horns
Rockwood	Makana	C le Roux	44784			Lynx	1	✓		Full skin, skull, teeth
Thornkloof	Caradu	F. Bowker				Bontebok	1	✓		Half Cape Btkin, Skull, Horns
Rockwood	Makana	C le Roux				White Steenbuck	1	✓		Cape Btkin, Horns, Skull
						Common Spottedbuck	1	✓		Cape Btkin, Horns, Skull
						Common Kudu	1	✓		Cape Btkin, Horns, Skull
						Ostrich	1	✓		Feet, Wings, Feet, Skull
						Mountain Reedbuck	1	✓		Cape skull, Horns, Btkin
						Zebra	1	✓		Cape Btkin, Feet
						Bushbuck	1	✓		Cape Btkin, Skull, Horns

Copies: Client:

Original

Hunting:

1st copy Forward to Nature Conservation authority where hunt took place

2nd copy Retain for a period of three years

Professional Hunter:

Last copy Remain in book

Address to which trophies are to be sent:

Code:

Country: Trophy Export Date (Estimate):

Copyright 543 726 2516



## ADDENDUM – ADDITIONAL INFORMATION



### STANDING PERMIT

(Issued in terms of the provisions of the National Environmental Management Biodiversity Act 2004, Act 10 of 2004)

PERMIT NUMBER: S 09743

NAME OF ISSUING AUTHORITY	
NAME	DEDEAT
ADDRESS	PRIVATE BAG X 1006
	GRAHAMSTOWN
PROVINCE	EASTERN CAPE

DETAIL OF SPECIES INVOLVED				
SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
BONTEBOK	<i>Damaliscus pygargus</i>	Mixed	77	N/A
BLACK WILDEBEEST	<i>Connochaetes gnou</i>	Mixed	20	N/A

ADDITIONAL CONDITIONS	
Any supplement to the stock of black wildebeest/bontebok on the property from an external source must be sourced from a property where a registered/permitted herd of black wildebeest already occur	
2. Any transport of black wildebeest/bontebok off the property requires an application for an ordinary permit in terms of NEMBA Act 10 of 2004, in addition to this, the transport of bontebok off the property must be accompanied by DNA test results;	
3. DEDEA cannot guarantee the purity of the black wildebeest herd for any selling/hunting or other purposes whatsoever;	
4. This permit is subject to a valid CAE in terms of the Nature and Environmental Conservation Ordinance 19 of 1974;	
5. The species listed in this standing permit in terms of NEMBA: Threatened and/or Species Regulations are adequately enclosed. The ownership of the species listed is therefore maintained in terms of the Game Theft Act 105 of 1991	

PERMIT VALIDATION			
PERIOD OF VALIDITY	FROM:	24/03/2015	TO: 24/03/2018
RECEIPT NUMBER	AE297284		

THANDIWE JACK  SIGNATURE OF ISSUING OFFICER	<div style="text-align: center;">                       DEPARTMENT OF ECONOMIC DEVELOPMENT TOURISM AND ENVIRONMENTAL AFFAIRS                 </div> SIGNATURE PERMIT HOLDER
DATE STAMP:	<div style="text-align: center;">                       Private Bag X1006 Grahamstown 6140                 </div>

# Certificate of Registration

It is hereby certified that the bontebok herd on the

property Thornkloof

of Mr. F. Bowker has been inspected

on 21 April 1989 and found to be pure.



CHIEF DIRECTOR



CHIEF DIRECTORATE: NATURE AND ENVIRONMENTAL CONSERVATION, C P A



# REGISTRATION CERTIFICATE

(Issued in terms of the provisions of the  
National Environmental Management:  
Biodiversity Act 2004, Act 10 of 2004)

CERTIFICATE NUMBER: 30853

## NAME OF ISSUING AUTHORITY

NAME

ADDRESS

ADDRESS

PROVINCE

PRIVATE

706

DOWN

WESTERN

PROVINCIAL DEPARTMENT

NATIONAL DEPARTMENT

CAPTIVE BREEDING OPERATIONS

COMMERCIAL EXHIBITION EXHIBITION

GAME FARMS

NURSERIES

SCIENTIFIC INSTITUTIONS

SANCTUARIES

REHABILITATION FACILITIES

WILDLIFE TRADERS

UNIQUE REGISTRATION NUMBER

811 4507

00 CO&Q

## DETAILS OF CERTIFICATE HOLDER

NAME

neo S

ID NO. SO

5006

SURNAME

PASSPORT NO.

POSTAL ADDRESS

RESIDENTIAL ADDRESS

ADDRESS

O

2NKLOOF FARM

Box L

ADDRESS

ADDRESS

TOWN

GRAHAMSTCUO

RAHAMSTCUO

POSTAL  
CODE

6 C

6139

PROVINCE

ERN CAPE

asT era CAPE

## PROPERTY WHERE OPERATION WILL BE CONDUCTED

NAME AND SURNAME OF APPLICANT

DENHAM FRANCIS BOWLER

NAME AND SURNAME OF AGENT

PHYSICAL ADDRESS OF FACILITY

PHYSICAL ADDRESS OF FACILITY

THORNQVC) • FARM

DISTRICT NAME

cerTAMS

DEVELOPMENT

DEPARTMENT OF E&E  
AND ENVIRONMENT

DATE STAMP

PROVINCE REGISTERED		the farm)	2N CAPE
NAME AND NUMBER (in case of game)			
PARTICULARS OF SPECIES			
SPECIES		SEX (if known)	QUANTITY
COMMON NAME	SCIENTIFIC NAME		
BONTERO	SCXO <i>Monochloris</i>	MIXED	SIXTY - sm -THREE
			want
CERTIFICATE VALIDATION			
PERIOD OF VALIDITY	FROM:	0 - 2011	TO: 1g - 10 - 2014
RECEIPT NUMBER	RE272892		
CAPIN 81127 & uAC7			
SIGNATURE ISSUING OFFICER		SIGNATURE CERTIFICATE HOLDER	

12801

#### GENERAL CONDITIONS

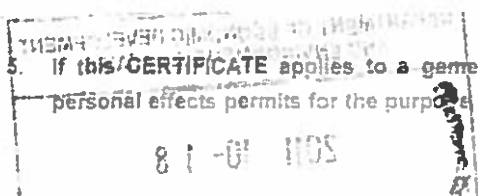
1. This CERTIFICATE not transferable.
2. Any unauthorised alteration to this CERTIFICATE shall render invalid.
3. This CERTIFICATE is subject to the provisions of any applicable law during the period of validity of the CERTIFICATE, in the area to which the CERTIFICATE applies.
4. This CERTIFICATE is vatic only within the province where it was issued.
5. The holder of this CERTIFICATE Shan, at the request of a person authorized in terms of applicable legislation so to demand, forthwith produce such CERTIFICATE to such person.
6. The holdei this CERTIFICATE shan the CERTIFICATE to the issuing authority mentioned on the CERTIFICATE within 7 (seven) working days after expiry of the CERTIFICATE.
7. This CERTIFICATE shall be invalid until such time that it is signed by the holdey thereof.
8. This CERTIFICATE shall be deemed invalid when it is lost or destroyed and no copy thereof shall be issued.
9. This CERTIFICATE may be withdrawn by an authorised person if the execution of any activity may be detrimental to the welfare of any animal or the sefety of any person, provided that the CERTIFICATE holder is given notice of such intention and be granted the opportunity to appeal to such withdrawal.

10. The prescribed fees paid for the issuing of this CERTIFICATE shall not be refunded.
11. If the holder of this CERTIFICATE contravenes or fails to comply with any condition or requirement to which this CERTIFICATE is subject, he or she shall be guilty of an offence.
12. This CERTIFICATE shall be subject to any applicable norms and standards in existence at the time of this CERTIFICATE.

#### SPECIAL CONDITIONS

1. The issuing authority shall determine the species and restricted activities for which this CERTIFICATE will apply.
2. This CERTIFICATE is subject to any additional conditions as may be determined by the issuing authority.
3. If this CERTIFICATE applies to a captive breeding operation, commercial exhibition facility or rehabilitation facility, the holder of this CERTIFICATE must:
  - a. Prevent hybridization and/or inbreeding;
  - b. Keep a studbook, where appropriate;
  - c. Provide information relating to paragraphs (a) and (b) mentioned above to the issuing authority mentioned on this certificate, within three months after the end of each calendar year.
4. If this CERTIFICATE applies to a game sanctuary, the holder of this CERTIFICATE may not allow any breeding in the sanctuary.

If the holder of this CERTIFICATE does not qualify to be issued with a game capturing permit, the holder of this CERTIFICATE does not qualify to be issued with a game capturing permit.





## ADDENDUM – ADDITIONAL INFORMATION




### STANDING PERMIT

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

PERMIT NUMBER: S 09743

NAME OF ISSUING AUTHORITY	
NAME	DEDEAT
ADDRESS	PRIVATE BAG X 1006 GRAHAMSTOWN
PROVINCE	EASTERN CAPE

DETAIL OF SPECIES INVOLVED				
SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
BONTEBOK	<i>Damaliscus pygargus</i>	Mixed	77	N/A
BLACK WILDEBEEST	<i>Connochaetes gnou</i>	Mixed	20	N/A
<b>ADDITIONAL CONDITIONS</b> Any supplement to the stock of black wildebeest/bontebok on the property from an external source must be sourced from a property where a registered/permitted herd of black wildebeest already occur 2. Any transport of black wildebeest/bontebok off the property requires an application for an ordinary permit in terms of NEMBA Act 10 of 2004, in addition to this, the transport of bontebok off the property must be accompanied by DNA test results; 3. DEDEA cannot guarantee the purity of the black wildebeest herd for any selling/hunting or other purposes whatsoever; 4. This permit is subject to a valid CAE in terms of the Nature and Environmental Conservation Ordinance 19 of 1974; 5. The species listed in this standing permit in terms of NEMBA: Threatened and/or Species Regulations are adequately enclosed. The ownership of the species listed is therefore maintained in terms of the Game Theft Act 105 of 1991				
PERMIT VALIDATION				
PERIOD OF VALIDITY	FROM: 24/03/2015	TO: 24/03/2018		
RECEIPT NUMBER	AE297284			
THANDIWE JACK		 DEPARTMENT OF ECONOMIC DEVELOPMENT AND ENVIRONMENTAL AFFAIRS		
SIGNATURE OF ISSUING OFFICER		SIGNATURE PERMIT HOLDER		
DATE STAMP:		2015 -03- 24  Private Bag X1006 Grahamstown 6140		



14. EXPORT ENDORSEMENT:		15. Bill of Lading/Air Waybill Number:	
Block	Quantity		
C			
		Port of Export	Date
		Signature	Official stamp and title

V & R Printing Works (Pty) Ltd (012) 333 2462 (2621) PERMIT 1 CERTIFICATE N7 202596

CONDITIONS FOR PERMIT NO. 15 202596

Page 1 of 1

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:

- 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 7.
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/ 231 Fax: +27 (11) 390-1720
4. All relevant documentation, including original permit's (CITES permits must include original and coloured copy), Packing List's, Waybill's and Bill of entry's (SAD/ DA 550) must be presented for inspection. 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 and Waybill/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.





## GAME FARM HUNTING PERMIT

NAME OF ISSUING OFFICER:		SIGNATURE OF ISSUING OFFICER:	
RECEIPT NUMBER			



STAMP OF ISSUING AUTHORITY:

DETAILS OF HUNTER					
NAME			ID NO.		
SURNAME			PASSPORT NO.	(b) (6)	
	POSTAL ADDRESS			RESIDENTIAL ADDRESS	
ADDRESS	(b) (6)				
ADDRESS					
TOWN					
POSTAL CODE	(b) (6)				
PROVINCE	1				
PARTICULARS OF PROFESSIONAL HUNTER (in case of hunting client)	NAME AND SURNAME:		ROUX		
	CONTACT NUMBER:				
	RERMIT NUMBER: q		115 EC		
DETAILS OF REGISTERED GAME FARM OWNER					
REGISTRATION CERTIFICATE NUMBER		30751			
NAME: LANDOWNER		FRANK			
SURNAME: LANDOWNER		ROUX			
REGISTERED FARM NAME AND NUMBER		THORNKLOOF			
FARM SIZE (ha)		3000			
DISTRICT NAME		MAKINA			
PROVINCE		DETAILS OF REGISTERED ACTIVITIES INVOLVED			
HUNTING METHOD					
HUNTING INSTRUMENT					
HUNTING METHOD	WALK		PERMIT VALIDATION		
DURATION OF THE HUNT	FROM:	DETAILS OF SPECIES INVOLVED		TO:	
SPECIES	FROM:	SEX	TO:	QUANTITY	
COMMON NAME	SCIENTIFIC NAME	(if known)	TO:		
PERIOD OF VALIDITY					
RENTAL	MALES	MALE			
SIGNATURE OF GAME FARM OWNER:	[Signature]				
SIGNATURE OF HUNTER:					

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act •10 of 2004)

PERMIT NUMBER: GFH 06088 B

NAME OF ISSUING AUTHORITY

NAME	DE DEAT
ADDRESS	PRIVATE BAG 1000

(b) (6)

(b) (6)

(b) (6)

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: \_\_\_\_\_

Date: \_\_\_\_\_



Eubulu (b) (6) Kenn (b) (6)

19 MARCH 2018.



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)

RCVD MAR 30 2018

LB

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

A. Complete if applying as an individual			
1 a. Last name <b>KERTZ</b>	1 b. First name <b>Eubulus</b>	1 c. Middle name or initial <b>(b) (6)</b>	1 d. Suffix <b>(b) (6)</b>
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone number <b>(b) (6)</b>	4. E-mail address <b>(b) (6)</b>	

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>(b) (6)</b>					
1.b. City <b>Shreveport</b>	1.c. State <b>LA</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>	
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 – <b>attach documentation of fee exempt status as outlined in instructions.</b> (50 CFR 13.11(d))	
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in <b>Title 50, Part 13 of the Code of Federal Regulations</b> and the other <b>applicable parts in subchapter B of Chapter I of Title 50</b> , 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>MARCH 19<sup>th</sup> 2018</b>

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)?  
myself - (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:

MATETSI UNIT 1, MATABELAND NORTH,  
VICTORIA FALLS, ZIMBABWE

- b. Date wildlife is to be hunted: MAY 1 - 21<sup>ST</sup>, 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 JOSEPH 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 + ZPUNA

- 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 19<sup>th</sup>, 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).

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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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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](http://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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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](http://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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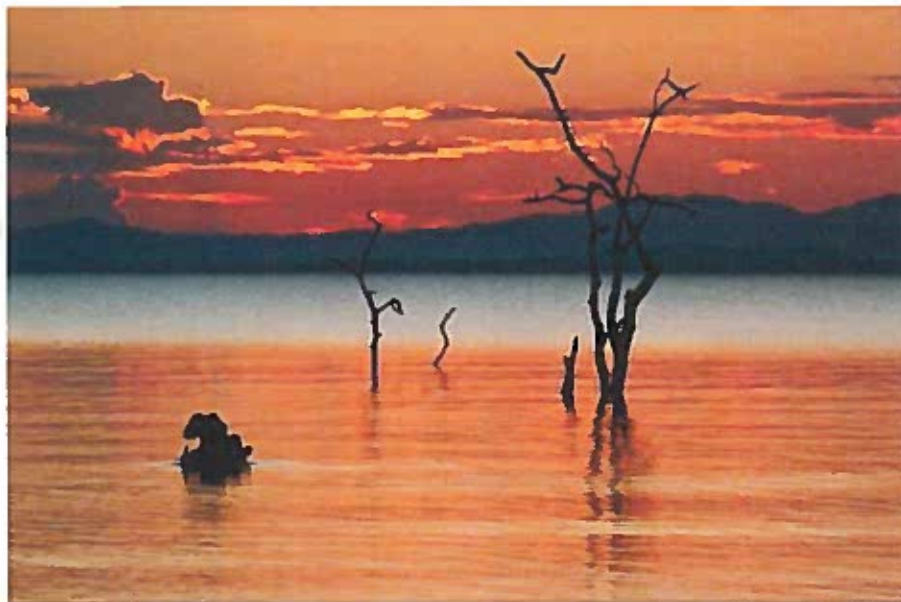
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company give back to the community. It is very important for the protection of our wildlife in these remote areas that we continue to assist the RDC with anti poaching, continue to pay for the sustainable off take of a select quota, because if we do 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 Matusadona 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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## 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 beneficiaries. 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 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

Beginning 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. Secondly, 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 whom 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 lesser 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
<b>Total</b>				<b>147045</b>	<b>66170.00</b>

#### 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
<b>Total</b>				<b>1910.00</b>	<b>859.50</b>

#### 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
<b>Total</b>				<b>85760.00</b>	<b>38 592.00</b>



**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
<b>TOTAL</b>				<b>11980.00</b>	<b>5391.00</b>

**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
<b>TOTAL</b>					<b>22 313.25</b>

**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
<b>TOTAL</b>					<b>1800</b>

**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
<b>TOTAL</b>					<b>6592.50</b>

**BULEMBI SAFARIS**

BUFFALO	M	1	2100	2100	945.00
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**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/l	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
<b>TOTAL</b>					<b>48 874.00</b>

**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
<b>TOTAL</b>				<b>32.035.00</b>	<b>14 415.75</b>

**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
<b>TOTAL</b>				<b>11 095.00</b>	<b>4 992.75</b>

**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
<b>Total</b>				<b>9 350.00</b>	<b>4 207.50</b>

**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
<b>TOTAL</b>				<b>2 100.00</b>	<b>945.00</b>

**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
<b>TOTAL</b>					<b>10 100.25</b>

#### **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
<b>Total</b>				<b>3 210.00</b>	<b>1 444.50</b>

#### **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
<b>TOTAL</b>				<b>4 200.00</b>	<b>1 890.00</b>

#### **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
<b>TOTAL</b>				<b>11 645.00</b>	<b>5 240.25</b>

#### **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 satellite 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**

<b><u>Year</u></b>	<b><u>Number of patrolled done</u></b>	<b><u>Snared recovered</u></b>	<b><u>Recoveries</u></b>	<b><u>Animal poached</u></b>	<b><u>Number of poachers arrested</u></b>
2013	139	76 cable snares	3 x303rifles 1x 458 rifle 10 rounds of AK47 30 rounds of	8 elephants 1 waterbuck 3 impala 1 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

(b) (6)

3/19/18 DATE

\$700<sup>00/100</sup>



DOLLARS

PAY TO THE  
ORDER OF

U.S.F.W.  
C. J. Fink



*[Signature]*

(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

May 3, 2018

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

U.S. Fish and Wildlife Service  
Division of Management Authority  
Branch of Permits, MS: 1A  
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



Regina Lennox <[regina.lennox.cf@gmail.com](mailto: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](mailto:regina.lennox@conservationforce.org)>, "cf@conservationforce.org" <[cf@conservationforce.org](mailto:cf@conservationforce.org)>

FYI

Sent from my iPhone

Begin forwarded message:

**From:** SPITS-II Production Email Messenger <[permits@fws.gov](mailto:permits@fws.gov)>  
**Date:** March 30, 2018 at 11:00:03 AM PDT  
**To:** **(b) (6)**  
**Cc:** <[permits@fws.gov](mailto:permits@fws.gov)>  
**Subject:** Mar 30 2018 2:00:00; Acknowledgement letter for Permit No. "84787C"  
**Reply-To:** <[permits@fws.gov](mailto:permits@fws.gov)>

EUBULUS **(b) (6)** KERR **(b) (6)**  
**(b) (6)** **(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.





Regina Lennox &lt;regina.lennox.cf@gmail.com&gt;

## 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

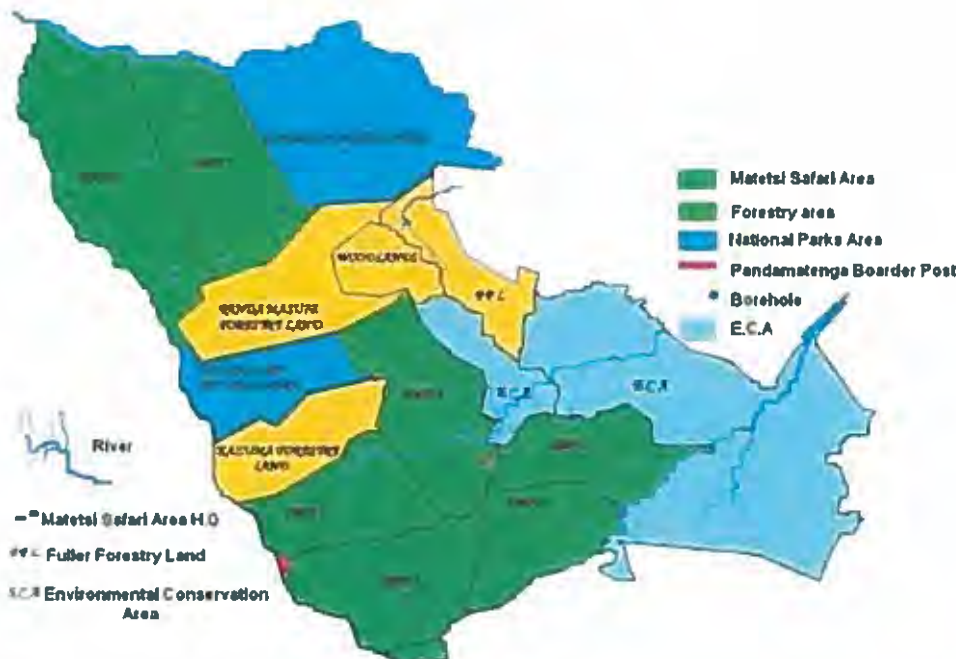
Sorry for the delay.

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 from 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](http://www.martinpieterssafaris.com)

(b) (6)

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.



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)  
To: "Regina A. Lennox" <regina.lennox@conservationforce.org>

Thu, Mar 22, 2018 at 1:24 PM

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>  
To: cf@conservationforce.org

Fri, Mar 23, 2018 at 9:51 AM

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](mailto: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](mailto:cf@conservationforce.org)>  
To: "Regina A. Lennox" <[regina.lennox.cf@gmail.com](mailto:regina.lennox.cf@gmail.com)>

Mon, Mar 26, 2018 at 11:34 AM

Case manager, biologist

Name: Ann Barry

Email: [Anna\\_barry@fws.gov](mailto: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](mailto:jjj@conservationforce.org) • [www.conservationforce.org](http://www.conservationforce.org)



Regina Lennox &lt;regina.lennox.cf@gmail.com&gt;

**Fwd: Mokore Safaris Lion Hunt**

1 message

Eric Jahde (b) (6)

Thu, Mar 22, 2018 at 1:24 PM

To: Regina Lennox &lt;regina.lennox@conservationforce.org&gt;

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 (b) (6) 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)  
**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) 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)772 260-179  
skype gary.duckworth3  
[www.mokoresafaris.com](http://www.mokoresafaris.com)  
[www.mokoreecosafaris.com](http://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](mailto: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 its 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 within 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.

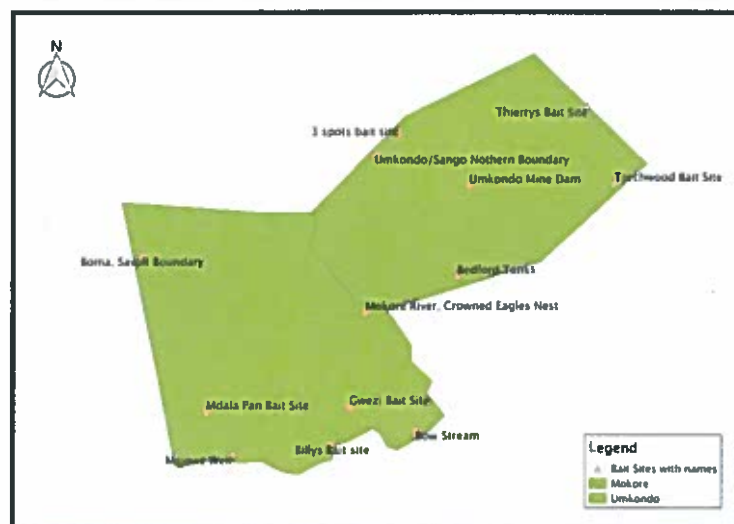


Image 1: Randomly selected bait sites throughout Mokore and Umkondo Ranches.



## **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
Sc	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

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## 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

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### 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

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### How to Age a Lion

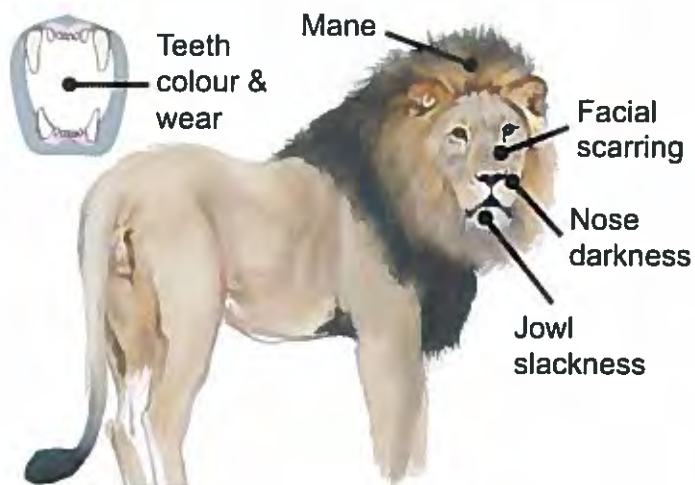
Scientific research on lions across Africa shows that a male lion's appearance changes with five main physical characteristics that can be distinguished into four age classes (Miller et al. 2016):

#### 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

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### 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

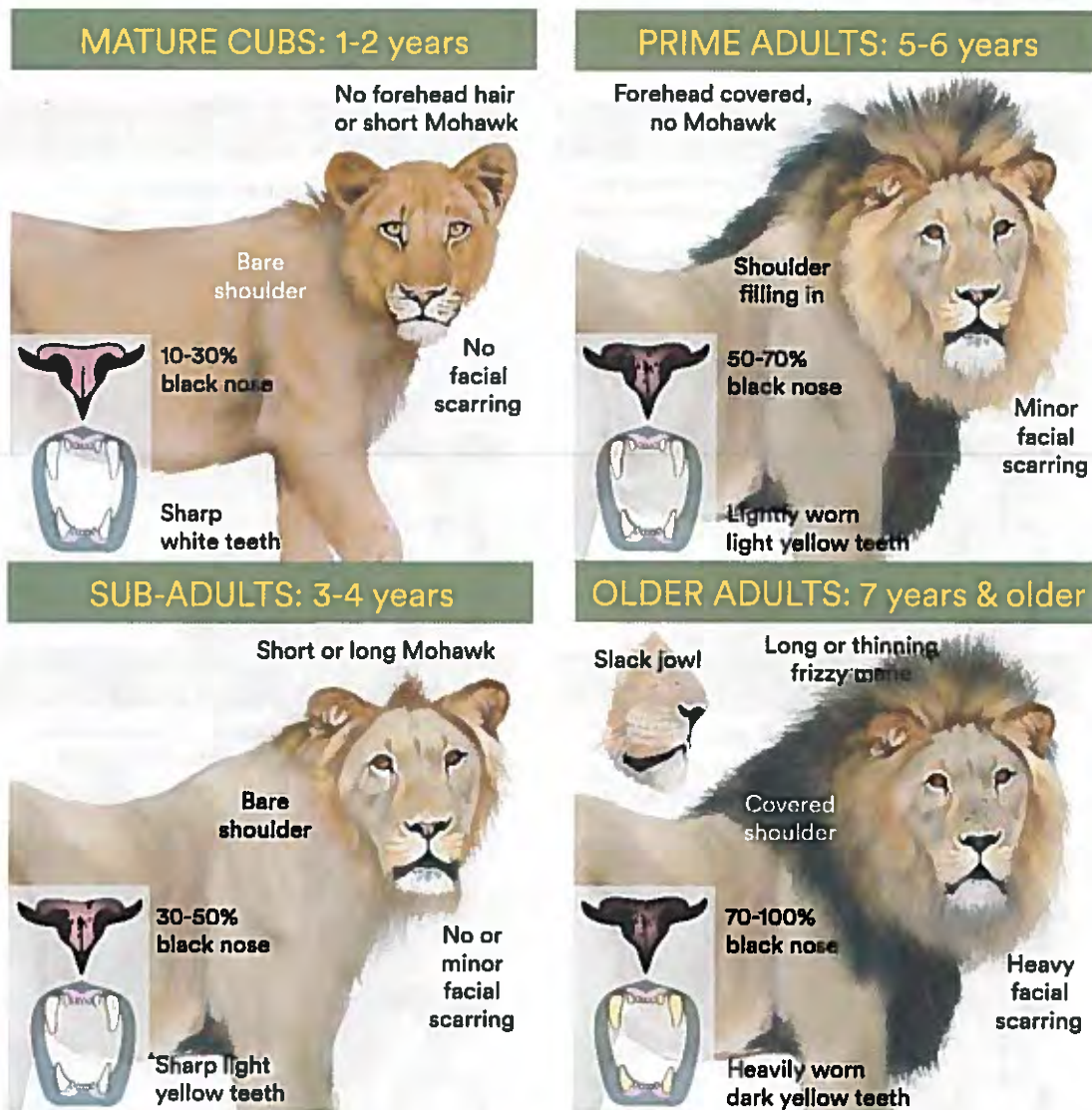
To see your improvement after reviewing this training and the online photos and pocket guides, re-test your lion aging accuracy online at <http://AgingTheAfricanLion/TestYourself.org>.

### 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 skimmers books complete with all measurements and details. Also those hunting in Sengwa please make sure that the measurements of all trophies is completed on the ZPWMA kill returns supplied in the file.
3. 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:

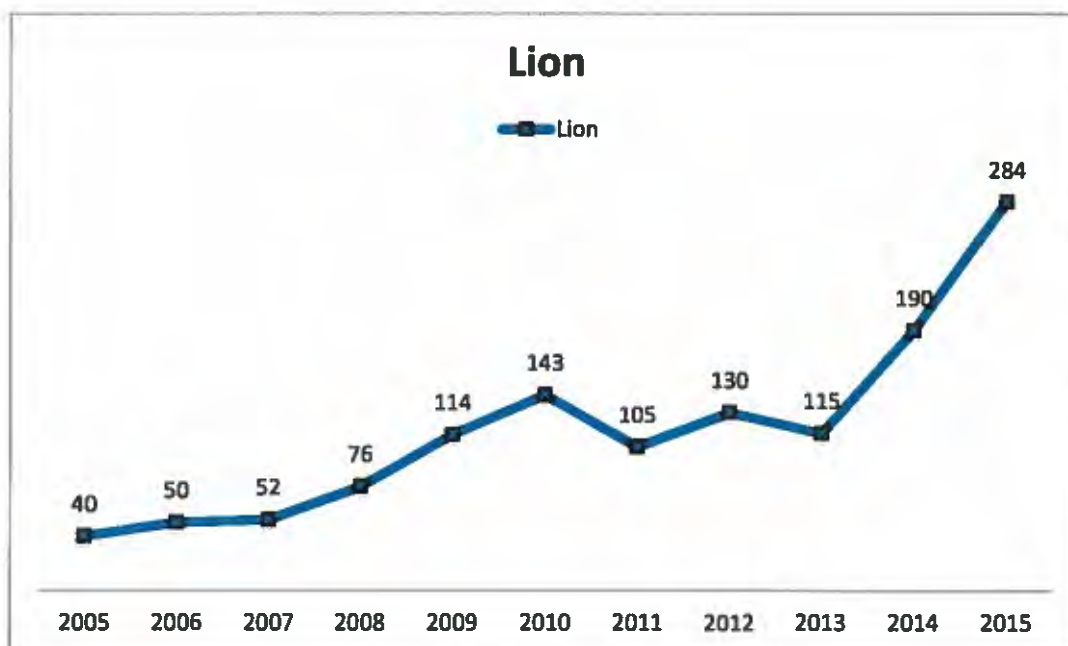


Figure 1: Population trends for Lion of the SVC from 2005 to 2015.

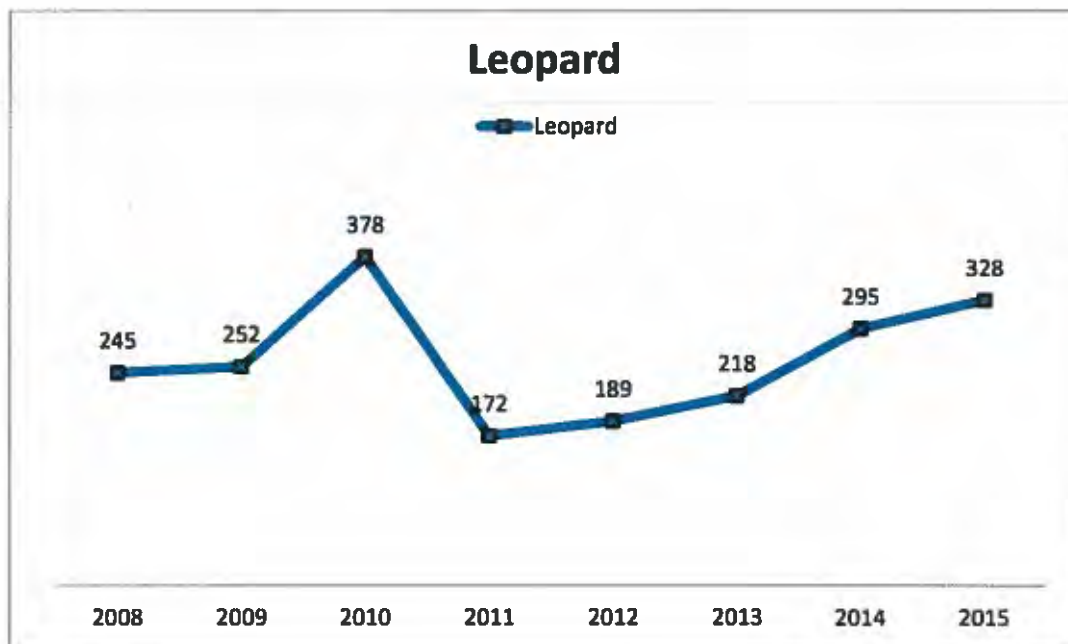
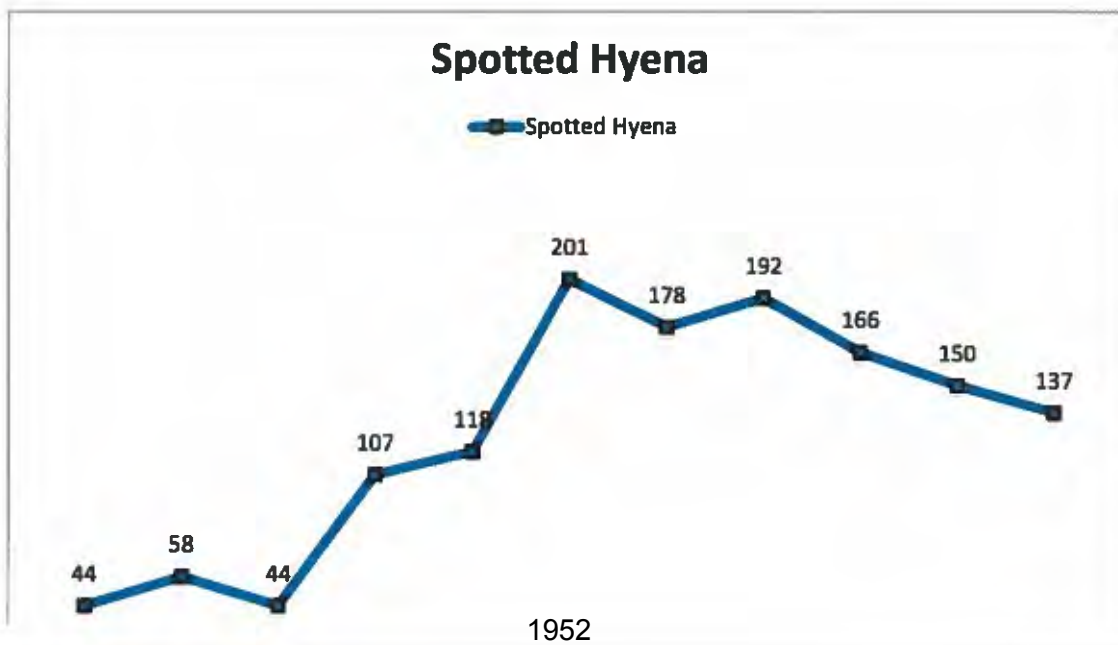


Image 2: Population trends of Leopard for the SVC from 2008 to 2015.





**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 - \$1,500/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 - \$1,500/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 - \$1,500/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	Carnal	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 rehabilitate 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.

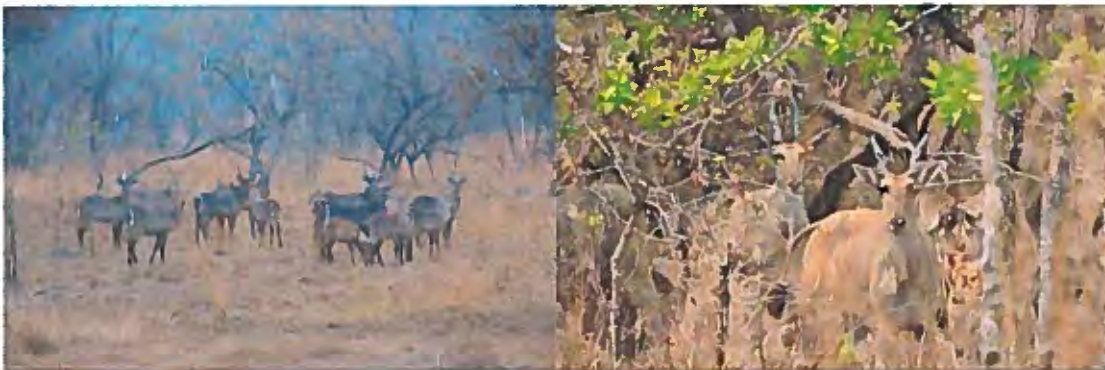




Waterbuck numbers, a species that once thrived in Coutada 9, were down to a mere handful after the civil war. RSS made a deal with Gorongosa National Park to swap 20 Zebra and 40 eland for 146 waterbuck. GNP got to increase their eland and zebra populations and C9 received 146 waterbuck in September 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.**







Department of Interior  
U.S. Fish and Wildlife Service

RCVD MAR 30 2018

# 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 <b>MARTIN</b>	1.b. First Name <b>HENRY</b>	1.c. Middle Name/Initial <b>(b) (6)</b>	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address

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

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

## Section C: All applicants complete address information

1.a. Physical address <b>(b) (6)</b>				
1.b. City <b>SAN ANTONIO</b>	1.c. State <b>TEXAS</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>U.S.A.</b>
2.a. Mailing address (include if different than physical address; include name of company) <b>(b) (6)</b>				
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) <b>(b) (6)</b> Date of signature (mm/dd/yyyy) <b>3/24/2018</b>

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)?

H. (b) (6)

MARTIN

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 AFRICANUS

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 MASINGO HUMANI  
SAVE VALLEY LATITUDE 20° 28' 40.1 (20.4778°) S  
CHIBUWE LONGITUDE 32° 14' 55.2 (32.2487°) E

b. Date wildlife is to be hunted:

SEPTEMBER 15, 2018

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

ROGER WHITTAL SAFARIS  
BUTCH COATON

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). *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:

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?

*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: \_\_\_\_\_

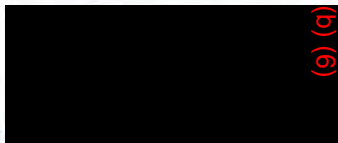
11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

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: 21. (b) (6) \_\_\_\_\_ Date: MARCH 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 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).



MARCH 24 2018  
Date



Pay To The Order Of

W.S. FISH AND WILDLIFE

\$ 100.00

ONE HUNDRED DOLLARS

Dollars



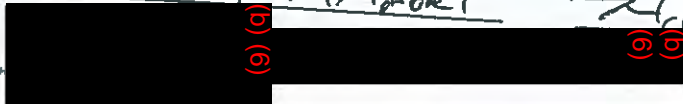
Frost

www.frostbank.com

For ELEPHANT IMPORT

Signature Checking

*[Signature]*





Department of Interior  
U.S. Fish and Wildlife Service

RCVD APR 30 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**  
(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 <b>Delamarter</b>	1.b. First Name <b>Harold</b>	1.c. Middle Name/initial <b>(b) (6)</b>	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address

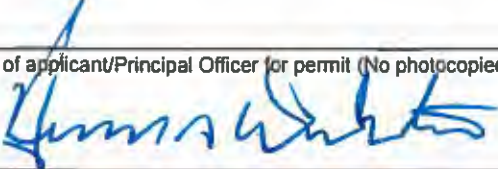
## Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

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

## Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite # or Room # no P.O. Boxes) <b>(b) (6)</b>				
1.b. City <b>Brush Prairie</b>	1.c. State <b>WA</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>
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)

(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?

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)

© 2005 INUIT INC. # 132 - 500-433-5810

PAY TO THE  
ORDER OF

US Fish & Wildlife Service

One Hundred Dollars & no/100

\$100<sup>00</sup>

DOLLARS

MEMO

U.S. BANK NATIONAL ASSOCIATION  
19-10/1250

April 25, 2018

*[Signature]*



RCVD APR 30 2018

LB

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

Type of Activity

U.S. Fish and Wildlife Service  
Division of Management Authority  
Branch of Permits, MS: 1A  
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 <b>ESTES</b>	1.b. First Name <b>ALDREDGE</b>	1.c. Middle Name/Initial	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address <b>MATT@GENUSLOGISTICS.C</b>

**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>(b) (6)</b>				
1.b. City <b>MIDLAND</b>	1.c. State <b>TX</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>
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 <i>Title 50 Part 13 of the Code of Federal Regulations</i> and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.
<p style="text-align: right;"><b>4/27/2018</b></p> <p>Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures)      Date of signature (mm/dd/yyyy)</p>	
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.

GENUS LOGISTICS 161-15 ROCKAWAY BLVD STE 205 JAMAICA NY 11434 ATTN : MATT  
SASE FEDEX INCLUDED

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. 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.

LOXODONTA AFRICANA , AFRICAN ELEPHANT

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:

KALKFELD AREA, NAMIBIA

b. Date wildlife was hunted:

AUGUST 3, 2017

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

OCKERT BAMB  
OMUJEVE 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]:

OMUJEVE SAFARIS  
ONGOMBO WEST SECTION 2  
NUMBER 56 WINDHOEK, NAMIBIA

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: OCKERT BAMB  
Business Name: OMUJEVE SAFARIS  
Address: ONGOMBO WEST SECTION 2  
City: NUMBER 56  
State/Province: WINDHOEK, NAMIBIA  
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). 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: 4/27/18

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).

**MINISTRY OF ENVIRONMENT AND TOURISM**

Directorate Scientific Services  
Private Bag 13306  
Windhoek, Namibia  
Enquiries: Chief Warden,  
Permit Office



Tel +264-61-284 2111  
Fax +264-61-258 861

**PERMIT No.:**
**173754**
**VALID FROM:**
**02.08.2017**
**VALID TO:**
**10.08.2017**
**PERMIT TO HUNT FOR TROPHIES**

Permission is hereby granted in terms of the Nature Conservation Ordinance 1975 (Ord. 4 of 1975)

**Name of Trophy Hunter:**
**A. Estes**
**Residential Address:**
**U.S.A**
**Country:**

to hunt the specified number of game for the sake of trophies:



Indicates species listed on CITES  
Appendix I or II

	SPECIES: COMMON NAME	Number
	Buffalo	/
SAS I	Crocodile	/
	Dik-dik	/
	Eland	/
SAS II	Elephant (PROBLEM) (VH) (X)	/
	Giraffe	/
	Grey Duiker	/
SAS II	Hippopotamus	/
	Impala, Black-faced	/
	Impala, common	/
	Klipspringer	/
	Kudu	/
SAS II	Lechwe	/
	Oryx (Gemsbok)	/
	Ostrich	/
	Red hartebeest	/
	Reedbuck	/
SAS I	Rhinoceros, black	/
SAS I	Rhinoceros, white	/
	Roan	/
	Sable	/
	Springbok	/

	SPECIES: COMMON NAME	Number
	Steenbok	
	Warthog	
	Waterbuck	
	Wildebeest, blue	
	Zebra, Burchell's	
SAS II	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
SAS I	Cheetah	
SAS I	Leopard	
SAS II	Lion	
	Other	
	* Please report back within 14 days after hunt	
	* Funds generated must be paid to share among all trophy hunters who have suffered the charges	
	* No more copies of this should be paid into Game Product Trust Fund.	

on the following farms / hunting concessions:

**Kalkfeld Area**
**Guided by (name of guides):**
**O.C. Barm**
**Cashier receipt No.:**
**21455114**
**Issued on:**
**02.08.17**
**Amount received:**
**NS. OF ENVIRONMENT & TOURISM**
**ISSUING OFFICER:**
**Authorizing officer:**
**IMPORTANT: This permit is not valid if altered in any way.**
**UNDER THE AUTHORITY OF THE MINISTER**
**OF ENVIRONMENT & TOURISM**
**ORDINANCE, 1975 (ORDINANCE NO. 4)**
**(1975)**
**Official MET date stamp**

**2017-08-02**



4

74

No trophy hunter may hunt unless accompanied by a professional hunter, master hunting guide or hunting guide.

This permit must be kept on the person of the permit-holder at all times while hunting.

1983

# Genus Logistics Inc.

16115 Rockaway Blvd STE 205 Jamaica NY 11434

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

Individual U.S. Customs Service Individual IRS / SS #

(b) (6)

☒ Individual

Partnership 141.32. C.R.

☐ Partnership

☐ Sole Proprietorship

☐ Corporation

## CUSTOMS POWER OF ATTORNEY

(b) (6)

KNOW ALL MEN BY THESE PRESENTS: That, ALDREDGE ESTE (Full Name of person, partnership, corporation, or sole proprietorship (identify)) a corporation doing business under the laws of the State of TEXAS or a doing business as residing at (b) (6) MIDLAND TEXAS (b) (6) having an office and place of business at (b) (6) MIDLAND TEXAS (b) (6) hereby constitutes and appoints each of the following persons Genus Logistics Inc.

may act through any of its offices 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 consigned 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, unloading 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, unloading, 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. 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 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. Or until revoked. Pursuant to 19 CFR 111.36(a), election is made waiving the right to receive invoices, supporting documents and correspondences from Genus Logistics Inc., who is directed to forward all documents and inquiries concerning our imports to their customs brokerage services, to our freight forwarder, who will pay Genus Logistics Inc., 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) ALDREDGE ESTE (b) (6) has caused these presents to be sealed and signed:

(Signature) (b) (6)

(Capacity) SALT (Date) 1/23/18

WITNESS Rach Corte

THIS DOCUMENT HAS A COLORED BACKGROUND AND MICROPRINTING. THE REVERSE SIDE INCLUDES AN ARTIFICIAL WATERMARK

Genus Logistics Inc.  
161 15 Rockaway Blvd Suite 205  
Jamaica NY 11434  
Tel: 718 790 0216

Chase  
JP Morgan Chase Bank, N.A.  
www.chase.com

(b) (4)

PAY **United States Fish and Wildlife Services**

DATE 04/27/18

**ONE-HUNDRED AND 00/100\*\*\*\*\***

\$ **100.00**

PAY TO THE ORDER OF  
United States Fish and Wildlife Services  
5275 Leesburg Pike  
Falls Church, VA 22041-3803

DOLLARS

Memo 0011639 LOXA import prmit II ESTES

(b) (4)





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: 1A  
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)

RC MAY 31 201

LB

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

<b>A. Complete if applying as an individual</b>			
1.a. Last name <b>Robinson</b>	1.b. First name <b>Mark</b>	1.c. Middle name or initial <b>(b) (6)</b>	1.d. Suffix
2. <b>(b) (6)</b>			
<b>B. Complete if applying on behalf of a business, corporation, public agency, tribe, or institution</b>			
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		5. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

<b>C. All applicants complete address information</b>					
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, block; U.S. hunters must provide their U.S. address) <b>(b) (6)</b>					
1.b. City <b>Leesburg</b>	1.c. State <b>VA</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>	
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	

<b>D. All applicants MUST complete</b>	
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) <b>04/22/2018</b>

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.

**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)?  
504-837-1233 cf [ec@conservationforce.org](mailto:ec@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.  
*Loxodonta Africana, African Elephant*
- 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:  
*Namibia - Otjambangu/Ombujokanguindi Conservancy*  
*Nearest City - Karmanjab*
- b. Date wildlife was hunted: *10/9/2017*
- b. Name of hunting outfitter, safari company, or professional hunter you hunted with:  
*Thormahlen & Cochran 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]:

*Windhoek, Namibia - The Yellow Shark Holdings Pty Ltd*  
*Windmill Park Unit 7*  
*Dante Street, Prosperita, Windhoek*

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: The Yellow Shark Holdings (Pty) Ltd.  
Business Name:  
Address: PO Box 81413, Olympia  
City: Windhoek  
State/Province:  
Country, Postal Code: Republic of Namibia

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? We saw well over 100 elephants during the hunt. The population in this area is very strong.

- 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 hunt package cost was \$23,000.

The funds were used to hire locals, maintain critical water holes and maintain open habitat for the elephants.

- 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?

By employing many of the local people to support the camp & the hunt, it places a value on the animals. This results in the local people and authorities leaving the elephants alone and allowing vast areas of open space for the elephants to roam.

**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:** 4/22/18

*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 Elephant 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: \_\_\_\_\_

Mark Robinson

Date: \_\_\_\_\_

5/18/18

GRIZZLY BEAR

(b) (6)

(b) (6)

5/18/18

Date

PAY TO THE  
ORDER OF

U.S. Fish and Wildlife Service

\$ 100

one hundred

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Dollars



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1-800-BANK BBT BBT.com

For

(b) (6)

*[Signature]*

MP

WILDLIFE PORTRAITS®





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)**

NOV 17 2017

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 <b>AYL</b>	1.b. First name <b>DAVID</b>	1.c. Middle name or initial <b>(b) (6)</b>	1.d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Social Security No. <b>(b) (6)</b>	4. Occupation <b>(b) (6)</b>	5. Affiliation/ Doing business as (see instructions)
6.a. Telephone number <b>(b) (6)</b>	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		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. (b) (6) (m #; no P.O. Boxes)			
1.b. City <b>ARLINGTON DORS</b>	1.c. State <b>DI</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. Country <b>USA</b>
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)			
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province
2.f. Country			

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: <b>084514891819</b> No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <b>(b) (6)</b> <b>David Ayl</b> Signature (in blue ink) of applicant person responsible for permit. (No photocopied or stamped signatures)	
Date of signature (mm/dd/yyyy) <b>10-23-17</b>	

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.

**AFRICAN 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):

**ZAMBIA - EASTERN PROVINCE MWANTA CMA NEAREST CITY IS  
MFWWE GIS COORDINATES 36L 0397901 UTM 8589200**

b. Date wildlife was hunted:

**10-5-17**



- 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 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]:

MVN SAFARIS  
PLOT NUMBER 6980 KATANGA ROAD  
HEAVY INDUSTRIAL AREA 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: MVN SAFARIS  
Business Name: MVN SAFARIS ZAMBIA LIMITED  
Address: P.O. BOX 35225 LUSAKA  
Address: 6980 KATANGA ROAD  
City: LUSAKA  
State/Province: LUSAKA  
Country, Postal Code: 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: David (b) (6) [redacted] [signature] Date: 10-23-17

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):

DAVID (b) (6) AUL

(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.



(b) (6)

99-7011/3070

(b) (6)

DATE 11-7-11

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ORDER OF

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(b) (6)

*Marked by hand* MP





Vargas, Darcy &lt;darcy\_vargas@fws.gov&gt;

---

**64271C / import of lion trophy**

---

David Aul (b) (6)  
To: darcy\_vargas@fws.gov  
Cc: (b) (6)

Mon, Jun 11, 2018 at 12:35 PM

Ref: 62471C

Ms. Vargas,

My father, David G. Aul, has asked me to assist him with getting you the information you have requested. Attached are the hunting permit and license documents you requested. The hunt was conducted in a GMA. My father's lion is listed on line #2 on the aging report (Client "DAG" should be DGA). The professional hunter ("PH") who guided on his trip, Jason Stone, said that this report also incorrectly lists a different PH (see attached text message).

Please let me know if you require any additional information.

Sincerely,

David J. Aul

**From:** (b) (6) [REDACTED]  
**Sent:** Thursday, June 07, 2018 3:34 PM  
**To:** (b) (6)  
**Subject:** Fwd: [EXTERNAL] Re: 64271C / import of lion trophy

-----Original Message-----

From: Vargas, Darcy <darcy\_vargas@fws.gov>  
To: ahvets (b) (6)

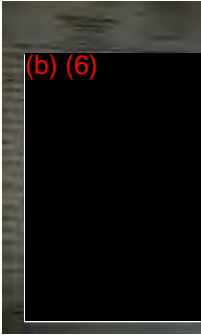
[Quoted text hidden]

[Quoted text hidden]

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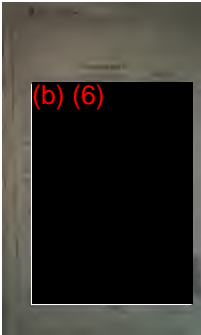
**5 attachments**

hunting license - lion.jpg  
121K



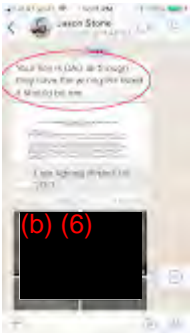
**hunting license - record of animals harvested.jpg**

141K



**permit to hunt in GMA.jpg**

111K



**text msg from Jason Stone.PNG**

485K



**Lion Ageing Report for 2017.pdf**

1150K



## REPUBLIC OF ZAMBIA

THE ZAMBIA WILDLIFE ACT  
(ACT NO. 12 OF 1998)

24993

FORM ZAWA 7

THE ZAMBIA WILDLIFE  
(LICENSES AND FEES) REGULATIONS, 2007PERMIT TO HUNT IN A GAME MANAGEMENT AREA  
(Regulation 4)Station of issue Chibanga Date of issue 19/9/17

## 1. DETAILS OF PERMIT HOLDER

Full name Aul David (b) (6) NRC/Passport No. (b) (6)

Postal Address (b) (6)

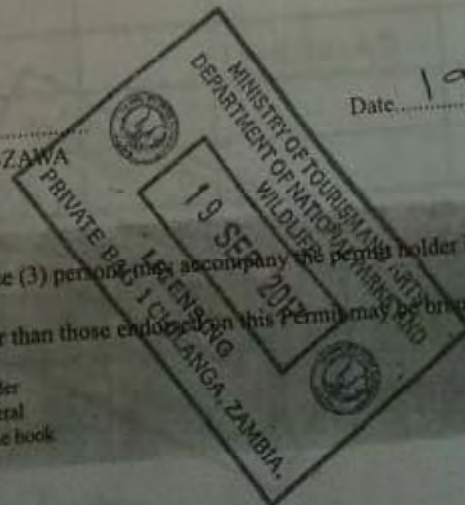
Residential Address USAFirearm License No(s) Company FirearmsCalibre(s) 375

Resident Hunting Licence - National/District (Nos.)

Bird Hunting Licence No.

Is hereby authorised to hunt in Leemembe GameManagement Area Mwanysa Hunting blockFor 19 days from 20/9/17 to 10/10/17 (dates inclusive)Fees Paid K \$150 Receipt No.Date 19/9/17Director General-ZAWA  
Conditions of issue

1. Not more than three (3) persons may accompany the permit holder into the Game Management Area.
2. No firearms, other than those endorsed in this Permit may be brought into the Game Management.

White copy to the Permit holder  
Yellow copy to Director General  
Blue copy to be retained in the book



## **SUMMARY REPORT ON AGING OF THE 2017 HUNTED LIONS. BY DNPW Research Unit.**

### **1.0 BACKGROUND**

The Department of National Parks and Wildlife in 2017 issued a lion sport hunting quota of 34 animals. Out of the 34, a total of 21 were successfully harvested from 15 Hunting blocks.

Measurements and photos from Professional Hunters were submitted to three different independent assessors while DNPW also did its own assessment. Thereafter a meeting was held by the Ad hoc Aging Committee that finalised the age category of each lion hunted. Below are observations and recommendations as discussed during the aging committee meeting held on 17<sup>th</sup> May 2018 at Chilanga and results of the aging process presented in the attached table.

### **2.0 OBSERVATIONS AND RECOMMENDATIONS**

Further to the aging process, a few concerns and observations were made by the assessors and the aging committee.

**1<sup>st</sup> Observation : Poor and fewer photos taken than required.** Some professional hunters did not take all the required 10 (6 Field and 4 skull) photos and from the positions as indicated in the guidelines, while some were taken of dirty and bloody animals. This made aging difficult.

#### **Recommended Actions:**

- (I) More photographs should be taken right after the hunt with the nose and muzzle and teeth in particular should be clean of dirt and blood. These would significantly help with aging as often the nose is dirty and muzzle and teeth often bloody or in bad light. Better pictures would be essential for some of these lions.
- (II) PHs need to photograph the whisker-spot patterns (side of face on each side) better in order to better age them with known age-animals.

**2<sup>nd</sup> Observation: Incomplete submission of return forms.** Some parts of the return form were not completed while some PHs did not submit the trophies for measurement intine;

#### **Recommended Actions:**

- (I) DNPW will not accept incomplete submissions therefore will not process export permits or PH licences until complete returns are submitted;
- (II) All submissions of return forms and field photos should be made directly by PH or outfitter representative to DNPW and signed for but not through third parties like a taxidermy company.



**3<sup>rd</sup> Observation: Late submission of return forms.** The hunting guidelines require that trophies and completed return forms are submitted within two months of the hunt. This consequently, affected processing of aging and consequently processing of professional hunter's license and export permits.

**Recommended Actions:**

- (I) DNPW to fine and caution PHs for late submission;
- (II) No professional hunter's license will be renewed for repeat offenders;
- (III) Export permits will only be processed upon payment of fine and submission of complete returns form and trophy.

**4<sup>th</sup> Observation: Mixing up of Photos.** Some PHs who hunted more than one lion sent photos of different lions in one folder. This made it difficult to tell one animal from the other thus affected aging.

**Recommended Actions:**

- (I) All photos should be submitted as JPEG in one folder for each lion hunted and properly labelled using the naming format: GMA\_Hunting Block\_PH's last name. For example, if a PH by the name of Jeff Banda hunted two lions in Mwanya, the folder should be called "Lumimba\_Mwanya\_Banda1" and the second lion's folder "Lumimba\_Mwanya\_Banda2".
- (II) Figure 1 photo of whole body from side should include PH in photo for identification.
- (III) Capture trophy's label must be captured in the photo

**5<sup>th</sup> Observation: Age of hunted lions:** From the estimates of the 2017 trophies assessed, the youngest lion was Munyamadzi Game Ranch and Sandwe while the oldest was in Mukungule. There were no subadult lions/young adult or female lions taken, and no extremely old lions taken apart from Mukungule who was judged to be at least about 8yrs.

**Recommended Actions:**

No further action but to congratulate most PHs for sticking to the hunting guidelines on age and especially Boabab Safaris for harvesting the oldest lion in 2017. DNPW further encourages PHs to increase their hunting effort and use camera traps to improve on field identification of lions

**6<sup>th</sup> Observation: Average age of Hunted lions and Quota:** The majority of lions taken in 2017 assessed here all within the 5-6 year old range. While this may be acceptable given a 5-year old minimum but it is not ideal not sustainable over time.

**Recommended Actions:** We would highly recommend that the allocated quotas not exceed 1 lion/hunting block/year, as was discussed when lion hunting was reopened in 2016. This will help to ensure trophy quality as well as maintain sustainability of lion hunting in years to come. People will never be able to find truly old lions if they are shooting them as 5-6 year olds every year.

**Table showing results of aging for lions hunted in 2017 and one in 2016**

S/N	Hunting Block	Client	Name of PH	ASSESSOR				Final Age Category	Comments
				A	B	C	D		
1	Lumimba Mwanya	RA	Jason Stone	5-6	4>5,5	5-6	5-6	II	
2	Lumimba Mwanya	DAG	Van Noordwyk	5-6		5-6	6-7	II	Name of Professional Hunter (PH) on this line incorrect. It should be Jason Stone. See attached text msg.
3	Lumimba Nyaminga	LM	Ross Heath	NA	NA	NA	NA	Not Aged	Did not hunt lion in 2017
4	Lunga Luswishi_Kasempa	TA	Bell-Cross	6	5,5>6	5-6	5-6	II	Neck Snare Mark behind ears?? Mane growing up & back on forehead (but may have lost mane anterior of snare mark), Heavy facial scarring looks fresh; Snare wear on UL Canine; skull appears wide
5	Lupande_Upper	SSFBR	Leon Kachfihoffer	7-9, >7	5-6	≥7	5-6	I	Absent/lost (in life) UL PM4 may have caused asym tooth wear, but real wear is still apparent and hvy. Lion age known at 8yrs
6	Lupande-Lower	LRB	Buske	5-6, 6	6-7	≥7	5-6	II	
7	Lupande-Lower	WK	Van Noordwyk	6, 6-7	5-6	5-6	5-6	II	
8	Mukungule	RFD	Swanepoel	8-10, >8	≥7	≥7	7-8	I	UL Canine & LR Canine broken but well smoothed; all teeth show heavy wear. Good pics



19	Sandwe	LG	Valerio Ventriglia	5-6, 6, 6-7	5-6	4-5	4-5	II,III	insufficient trophy photos (no tooth color, no full body); trophy photo appears to show snare injury to RH foot, severe underbite would influence tooth wear esp Inc,
20	OGR Munyamadzi	MPz	Thor Kichner	5, 5-6	5-6	4-5	5-6	II	Snare damage to both U Canines (more on left)
21	OGR NYAMVU	DRW	Van Noordwyk	5-6, 6, >7	6-7	5-6	5-6	II	Both U Canines damaged, UR appears slightly smoothed at tip while UL unclear when damage occurred
22	Musalangu_Chikwa West	JTA	Jeff Rann	NA	NA	NA	NA	II	this was 2016 Hunted lion, ver late submission

Submitted

Jones Kiwala Masonde

**PRINCIPAL ECOLOGIST-RESEARCH**

## REPUBLIC OF ZAMBIA

THE ZAMBIA WILDLIFE ACT  
(ACT NO. 12 OF 1998)

24993

FORM ZAWA 7

THE ZAMBIA WILDLIFE  
(LICENSES AND FEES) REGULATIONS, 2007PERMIT TO HUNT IN A GAME MANAGEMENT AREA  
(Regulation 4)Station of issue Chibanga Date of issue 19/9/17

## 1. DETAILS OF PERMIT HOLDER

Full name Aul David (b) (6) NRC/Passport (b) (6)Postal Address: (b) (6) MwanysaResidential Address: USAFirearm License No(s) Company FirearmsCalibre(s) 375

Resident Hunting Licence - National/District (Nos.)

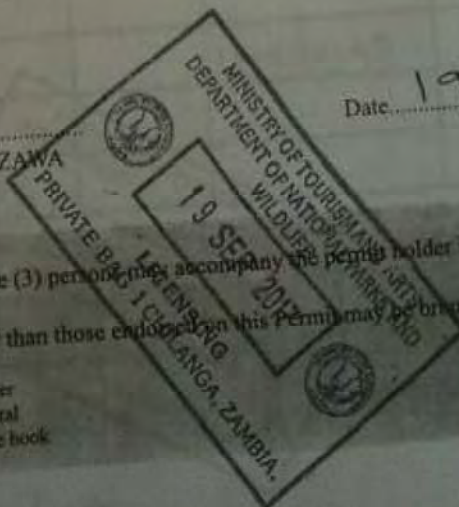
Bird Hunting Licence No.

Is hereby authorised to hunt in Leemembe GameManagement Area Mwanysa Hunting blockFor 19 days from 20/9/17 to 10/10/17 (dates inclusive)Fees Paid K \$150 Receipt No.Date 19/9/17

Director General-ZAWA

## Conditions of issue

1. Not more than three (3) persons may accompany the permit holder into the Game Management Area.
2. No firearms, other than those endorsed on this Permit may be brought into the Game Management.

White copy to the Permit holder  
Yellow copy to Director General  
Blue copy to be retained in the book



Jason Stone

Seen today at 11:49 AM



Today

Your lion is DAG all though  
they have the wrong PH listed  
it should be me.

11:01 AM

**SUMMARY REPORT ON AGING OF THE 2017 HUNTED LIONS,  
BY DNPW Research Unit.**

**1.0 BACKGROUND**

The Department of National Parks and Wildlife in 2017 issued a lion sport hunting quota of 34 animals. Out of the 34, a total of 21 were successfully harvested from 15 Hunting blocks.

Measurements and photos from Professional Hunters were submitted to three different independent assessors while DNPW also did its own assessment. Thereafter a meeting was held by the Ad hoc Aging Committee that finalised the age category of each lion hunted. Below are observations and recommendations as discussed during the aging committee meeting held on 17<sup>th</sup> May 2018 at Chitanga and results of the aging process presented in the attached table.

pdf

## Lion Ageing Report for 2017

4 pages • 1.2 MB • pdf

11:01 AM

(b) (6)

11:01 AM

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11:01 AM

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(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-64271C

Enhancement Finding  
Applicant: David (b) (6) Aul (PRT-64271C)

David (b) (6) Aul submitted an application on November 21, 2017, 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 October 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. Aul's application involving a *P. l. melanochaita* sport-hunted trophy taken in the Eastern province Mwanza, 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. Aul'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 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. Aul'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 17<sup>th</sup> 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. Aul'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<sup>2</sup> of wildlife area (average 189 km<sup>2</sup> 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<sup>2</sup> (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<sup>2</sup> (approximately 10,000 km<sup>2</sup> 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<sup>2</sup> (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 of 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 unsustainable 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 and 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. Aul's hunting and subsequent import of this lion provides 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 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 undertaken by Mr. Aul will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Mr. Aul, 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. Aul.


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 David (b) (6) Aul.**

  
Darcy Vargas, Biologist  
Branch of Permits  
Division of Management Authority

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

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**Permit Number: MA64271C-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:**

DAVID (b) AUL

(b) (6)  
ARLINGTON HEIGHTS, IL (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).



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

RCUD NOV 21 2017

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 BURNS	1.b. First name THOMAS	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions)
6.a. Telephone number (b) (6)	6.b. Alternate telephone number (b) (6)	6.c. Fax number (b) (6)	6.d. E-mail address (b) (6)

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

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

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 060509031779 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) <i>T. Burns</i> Date of signature (mm/dd/yyyy) 11/17/2017	

Please continue to next page

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

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

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

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

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

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

1. For each trophy to be imported, provide:
  - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.  
P.L. Melanochaita (African Lion)
  - b. Sex (if known).  
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
  - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
  - 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):  
Zambia Southern Province, Mulobezi, GPS: 16°19'22.18"S; 25°25'28.90"E
  - b. Date wildlife was hunted:  
July 7, 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 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]:

Bangweulu Taxidermy, 4142/K 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: Michael Borman  
Business Name: Bangweulu Taxidermy, LTD.  
Address: 4142/K Chifwema Road  
Address: New Kasama  
City: Lusaka  
City: 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:  \_\_\_\_\_ Date: 11/17/2017

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



8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).
9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):
10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.
- ☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.
11. Who should we contact if we have questions about the application? (Include name, phone number, and email):  
Greg Brownlee - [Greg@nealandbrownlee.com](mailto:Greg@nealandbrownlee.com) or 918-299-3580  
Regina Lennox - [regina.lennox@conservationforce.org](mailto:regina.lennox@conservationforce.org) or 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.

### 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](mailto:cf@conservationforce.org)

Signed: \_\_\_\_\_



Name: \_\_\_\_\_



Date: \_\_\_\_\_



(b) (6)

(b) (6)

11/18/17

Date

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*[Signature]*

AP



# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
International Affairs  
5275 Leesburg Pike, MS: 1A  
Falls Church, VA 22041-3803



June 11, 2018

In Reply Refer To:  
FWS/AIA/DMA/PRT-64280C

Enhancement Finding  
Applicant: Thomas (b) (6) Burns (PRT-64280C)

Thomas (b) (6) Burns submitted an application on November 21, 2017, 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 7, 2016, 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. Burns' application involving a *P. l. melanochaita* sport-hunted trophy taken in the Zambian Southern Province, Mulobezi, 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. Burns' 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 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. Burns', 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 17<sup>th</sup> 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. Burns' 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<sup>2</sup> of wildlife area (average 189 km<sup>2</sup> 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<sup>2</sup> (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<sup>2</sup> (approximately 10,000 km<sup>2</sup> 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<sup>2</sup> (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 of 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 unsustainable 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 and 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. Burns' hunting and subsequent import of this lion provides 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 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 undertaken by Mr. Burns' will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Mr. Burns' 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. Burns.


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 Thomas <sup>(b) (6)</sup> Burns.

  
\_\_\_\_\_  
Darcy Vargas, Biologist  
Branch of Permits  
Division of Management Authority

 6/8/18  
\_\_\_\_\_  
Mary Coglianò, Chief  
Branch of Permits  
Division of Management Authority



## REFERENCES:

Creel S, M'soka J, Droge E, Rosenblatt E, Becker M, Matandiko W, and Simpamba T. May 2016. Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

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Permit Number: MA64280C-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

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

THOMAS (b) (6) BURNS  
(b) (6)  
AUSTIN, 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 2016 hunting season.
- D. Trophy must be accompanied by valid hunting authorization 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)



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

OMB No. 1018-0164  
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

RCVD SEP 19 2016

LB

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

Type of Activity:  
Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros

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 Costa	1 b First name Lawrence	1 c Middle name or initial (b) (6)	1 d Suffix
2 Date of birth (mm/dd/yyyy) (b) (6)	3 Occupation		
4 Affiliation/ Doing business as (see instructions)			
5 a Telephone number (b) (6)	5 b Alternate telephone number	5 c Fax number	5 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		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 Nottingham	1 c State NH	1 d Zip code/Postal code (b) (6)	1 e Country USA
(b) (6) (include if different than physical address, include name of contact person if applicable)			
2 b City Nottingham	2 c State NH	2 d Zip code/Postal code (b) (6)	2 e Country 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 <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 15US75316 B19 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature of applicant/person responsible for permit (No photocopied or stamped signatures) <span style="float: right;">Date of signature (mm/dd/yyyy) 9/13/2016</span>	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: none (Import is limited to two per hunter per calendar year)  
**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: none (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

N/A

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: *Rungwa Inyonga Game Reserve*

- b. Date wildlife was hunted: GPS co-ordinates 7 degrees, 1257.31"S and 33 degrees 4719.36"E  
August 10, 2016 to September 1, 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, skin, 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 document]:

P.O. Box 19746, Plot 23 Kasanga Street,  
Dar es Salaam, Tanzania, Tel: +255 685 621 780

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 appear on the face of the export permit].

Name: Business Heather Steele  
Name: Address: Game Frontiers of Tanzania Ltd.  
Address: P.O. Box 19746, Dar es salaam, Tanzania  
City: Tel: +255 685 621 780  
State/Province:  
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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 Attached*

**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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: \_\_\_\_\_

Date: 9/13/2016

*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.*

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).

New York, NY  
70E Sunrise Hwy #419  
Valley Stream, New York 11580

Ph 516-825-3950  
Fax 516-825-1929

9. 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):

Lawrence Costa, 35 Congress, St, Rumford, ME 04276, 207-364-5827

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):

Mary Arsenault: 207-364-5827: [marsenault@imservicesinc.com](mailto:marsenault@imservicesinc.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.



**Form 3-200-19 Additional info:**

5% of the safari fee goes to the conservation fees for the Tanzanian government and community development. In addition to that, the Trophy Fees paid directly to the Tanzanian government funds anti poaching and conservation in the areas the animals were taken

9/19/2016

(b) (6)

Bank of America.



5-13-110

9/13/2016

(b) (6)

PAY TO THE  
ORDER OF

U.S. Fish And Wildlife Service

\$ \*\*100.00

One Hundred and 00/100\*\*\*\*\*

DOLLARS

U.S. Fish And Wildlife Service  
5275 Leesburg Pike  
Falls Church, VA 22041-3803

Security features. Details on back.



*Mary Annan*  
AUTHORIZED SIGNATURE

MEMO

Form 3-200-19 app fee

(b) (6)



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

OMB No. 1018-0164  
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

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

Type of Activity:  
**Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

RCVD SEP 27 2016

LB

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

A. Complete if applying as an individual			
1.a. Last name <b>ZAICEK</b>	1.b. First name <b>DANIEL</b>	1.c. (b) (6)	
2.a. (b) (6)	4. Affiliation/ Doing business as (see instructions) /		
5.a. (b) (6)	1.b. Alternate telephone number /	5.c. Fax number /	(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; P.O. Box; etc.) <b>DANIEL ZAICEK</b> (b) (6)			
1.b. City <b>Ashford</b>	1.c. State <b>CT</b>	1.d. (b) (6)	1.e. Country <b>USA</b>
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) <b>SAME</b>			
2.b. City /	2.c. State	2.d. Zip code/Postal code:	2.e. Country/Province
2.f. Country			

D. All applicants MUST complete	
1.	Attach check or money order payable to the <b>U.S. FISH AND WILDLIFE SERVICE</b> in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – <i>attach documentation of fee exempt status as outlined in Instructions.</i> (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: <b>15USS2797B/9</b> No <input type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in <b>Title 50, Part 13 of the Code of Federal Regulations</b> 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. (b) (6) stand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <b>Daniel Zaicek</b> Signature of applicant/person responsible for permit (No photocopied or stamped signatures) <b>09/15/2016</b> Date of signature (mm/dd/yyyy)

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

~~African elephant~~ (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import is limited to two per hunter per calendar year)  
**Note: once imported, ivory cannot be re-exported.**

~~Southern white rhinoceros~~ (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, Bergzicht Game Lodge, Windhoek, Khomas Region

b. Date wildlife is to be hunted:

10/05/2016 → 10/12/2016

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

LEOPARD - full skin skull

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild:
- 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 document]:

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 appear on the face of the export permit].

Name: Business Bergzicht Game Lodge  
Name: Address: Hannes du Plessis (owner - P.H.)  
Address: P.O. Box 9121  
City: Windhoek, Karas Region  
State/Province: Namibia, (Africa) no postal code  
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported (b) (6) 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.*

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).

NY - NEW YORK

9. 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):

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):

DANIEL ZALICKI, (b) (6)

(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.

9/27/2016



167-10 SOUTH CONDUIT AVE., STE. 106  
JAMAICA, NY 11434  
(718) 723-2000



1-32/210

DATE

AMOUNT

PAY

21-Sep-16

\*\*\*100.00

ONE HUNDRED DOLLARS ONLY

TO THE  
ORDER  
OF:

U.S. FISH AND WILDLIFE SERVICE

VOID AFTER 90 DAYS



AUTHORIZED SIGNATURE

Security features. Details on back.



PAID TO: DANIEL (b) (6) ZAICEK-LEOPARD PERMIT

(b) (4)

(b) (4)



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:

RCVD OCT 18 2016

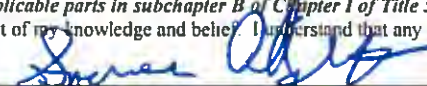
**IMPORT OF SPORT-HUNTED BONTEBOK TROPHIES FROM SOUTH AFRICA**

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

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1 a. Name of business, agency, Tribe, or institution		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) [REDACTED]				
1 b. City Burlington	1 c. State NC	1 d. Zip code/Postal code [REDACTED]	1 e. County/Province United States	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

D. All applicants MUST complete	
1	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue _____ No <input checked="" type="checkbox"/>
3	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) 10/10/2016

## E. IMPORT OF SPORT-HUNTED BONTEBOK TROPHIES from South Africa

**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 were 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:** The bontebok is listed as endangered under the Endangered Species Act. Applications for endangered species permits must be published in the Federal Register for a 30-day public comment period. Allow at least **90 days** for the application to be processed.

**Note 3:** This application can only be used if you have hunted/will be hunting in **South Africa**. If you have or will be hunting in a different country, please use form 3-200-20: <http://www.fws.gov/international/permits/by-form-number/index.html>

**Note 4:** USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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.

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 submit, indicate the application question number you are addressing. If applying for more than one trophy, be sure to indicate which trophy is addressed in each response.

1. How many Bontebok (*Damaliscus pygargus pygargus*) are you applying to import? Quantity: <sup>1</sup> \_\_\_\_\_

2. At the time of the application, if bontebok is:

Alive, a. What is the approximate date of proposed take? \_\_\_\_\_

August 10, 2016

Dead, b. What is the date you took the animal? \_\_\_\_\_

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

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]:

Splitting Image Taxidermy  
The Badger Building

14 Uitenhage Road  
Sydenham, 6001

Port Elizabeth  
South Africa

3. ENTER the name and address of the **landowner** on whose property the bontebok was or will be taken:

Name: Mr. C.E. Price  
Business Name: Ezulu Private Game Reserve  
Address: P.O. Box 185  
Address: Bedford District of the Eastern Cape, South Africa  
City: 5780  
State/Province:  
Country, Postal Code:

*Please be aware that the bontebok is listed in Appendix II of CITES. As such, you must obtain a CITES export permit from South Africa. If you are not exporting the trophy from South Africa directly to the United States, you will need to obtain a CITES Re-export certificate from the re-exporting country.*

4. a. Attach a signed statement from the **landowner** giving you permission to cull a bontebok from their captive herd.
  - b. If available, provide a copy of the landowner's Certification of Registration for the bontebok herd. (Note: this is **not** a copy of the export permit or certificate issued by a South African province.) In order to meet the criteria for a permit under the Endangered Species Act, the bontebok must be culled from a ranch that has been certified by the Government of South Africa under their bontebok program. If the ranch is not registered, we may be unable to issue an import permit.
5. **Complete name and address** of overseas person or business shipping the trophy to you (this name will appear on the face of the permit).

Name: Splitting Image Taxidermy  
Business Name: The Badger Building  
Address: 14 Uitenhage Road  
Address: Sydenham  
City: Port Elizabeth  
State/Province: South Africa, 6001  
Country, Postal Code:

**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(ies) 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**).

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(ies) 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**).

Applicant's signature:  Date: 10/10/2016

*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):

Andy Albright

Burlington, NC

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 state 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):

Mia Spillane

336-227-3319 ex. 1304

MSPILLANE@NAALEADS.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.



1 August 2016

**TO WHOM IT MAY CONCERN**

I, Charles Price, (ID 6702135009087), of Ezulu Game Reserve hereby give Mr Spencer Albright of [REDACTED] Burlington, [REDACTED], North Carolina, USA, permission to hunt a Bontebok ram from the captive herd on the property eZulu (GH CAE 02\_14) in the Bedford district from 2 - 13 August 2016.

Yours sincerely

**CHARLES PRICE**

**EZULU GAME RESERVE**



Province of the  
**EASTERN CAPE**

**DEPARTMENT OF ECONOMIC DEVELOPMENT  
AND ENVIRONMENTAL AFFAIRS**

P/Bag X0054, BHISHO  
South Africa, 5605  
Phone: +27 (40) 609 4717  
Fax: +27 (40) 609 4700

Web: [www.deaet.ecprov.gov.za](http://www.deaet.ecprov.gov.za)

E-mail: [jaap.pienaar@deaet.ecape.gov.za](mailto:jaap.pienaar@deaet.ecape.gov.za)

Enquiries:	Jaap Pienaar	Reference #:	Bont Price Ezulu
E-mail:	<a href="mailto:jaap.pienaar@deaet.ecape.gov.za">jaap.pienaar@deaet.ecape.gov.za</a>	Date:	12 April 2011

Mr.E.C.Price  
Ezulu private Game Reserve  
P.O.Box 185,  
Bedford  
5780

Dear Mr. Price

REGISTRATION OF BONTEBOK.

It is my pleasure to inform you that your Bontebok herd on the property Ezulu in the Bedford district of the province of the Eastern Cape has been registered as a pure herd. Congratulations!

The registration is done, based on the declaration by you, which state, that to the best of your knowledge, since the introduction of this herd, no contamination by any Blesbuck, took place on Ezulu and that the Bontebok originates from a registered pure bred herd. On the 7<sup>th</sup> to the 9<sup>th</sup> January 2011 a photographic testing program was also used in order to establish if the herd on the farm is pure.

This certification is extremely valuable and you should do everything possible to retain the purity of your herd. In future, export permits for sport-hunted bontebok trophies and permits to capture sell and transport bontebok, will only be issued in respect of registered herds.

Periodic re-inspections of registered herds will be carried out in future and it is in your own interest to ensure that no contamination of your valuable herd occurs. In the case of any possible contamination, this office must immediately be informed.

Once again, congratulations and thanks for your contribution towards Environmental Conservation.

A formal certificate will be send to you soon. In the meanwhile, this letter serves as the official proof of your registration.

Yours truly,

For: Chief Director Environmental Affairs; Eastern Cape



# **Certificate of Registration**

## **BONTEBOK HERD**



**It is hereby certified that the  
Bontebok herd on  
the property Ezulu, of  
Mr.E.C Price,  
in the Bedford District of the Eastern Cape,  
South Africa, is certified as pure on the  
12 April 2011**

**Presented to Mr.E.C.Price  
Date: 12 April 2011**

**For; General Manager: Environmental Affairs**

**Issued by: Department of Economic Development and Environmental Affairs  
Province of the Eastern Cape**



10/18/16

THIS CHECK IS VOID WITHOUT A BLUE & RED BACKGROUND AND A WATERMARK - HOLD UP TO THE LIGHT TO VERIFY

(b) (4)

Branch Banking & Trust Company  
Burlington, NC 27333  
66-112531

(b) (4)

Process: WebUser - January 10/10/16 04:18:12 pm

DATE 10/10/2016

AMOUNT \*\*100.00

PAY 10000  
ONLY One Zero Zero CENTS

PAY One Hundred and 00/100\*\*\*\*\*Dollars

TO THE U.S. Fish and Wildlife Service  
ORDER  
OF

*Anthony S. Albright*

CHECK IS PRINTED ON SECURITY PAPER WHICH INCLUDES A MICROPRINT BORDER & FLUORESCENT FIBERS

(b) (4)





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

OMB No. 1018-0164  
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

RCVD OCT 18 2016

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

Type of Activity:  
**Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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 <b>EDWARDS</b>	1.b. First name <b>THOMAS</b>	1.c. (b) (6)
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Occupation <b>(b) (6)</b>	
4. Affiliation (Doing business as (see instructions)) <b>(b) (6)</b>		

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

C. All applicants complete address information			
1. (b) (6)		O. Boxes	
1.b. City <b>JACKSONVILLE</b>	1.c. State <b>FL</b>	1.e. (b) (6)	1.f. Country <b>USA</b>
2.a. Mailing Address (include if different than physical address; include name of contact person, if applicable) <b>(b) (6)</b>			
2.b. City <b>JACKSONVILLE</b>	2.c. State <b>FL</b>	2.e. (b) (6)	2.f. Country <b>USA</b>

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  <b>[Signature]</b> Signature of applicant/person responsible for permit (No photocopied or stamped signatures)	
<b>8/30/2016</b> Date of signature (mm/dd/yyyy)	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: 1 (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: N/A (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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: Zambezi Region; Karimo Munjo District; Bwabwata National Park East; near the village of Kongola; GPS coordinate 517°44.408' E 023°21.743'

b. Date wildlife is to be hunted:

6/1/2017 - 6/17/2017

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

Elephant - hide, feet, ears, tusks, shoulder mount, skull  
Leopard - life size mount, skull, hide

3. IF THE ANIMAL IS DEAD, please enter the following:

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

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 document]:

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 appear on the face of the export permit].

Name: Business

Name: Address:

Address:

City:

State/Province:

Country, Postal Code:

Ndumo Safaris Ltd.

Karl Stumpfe / Frederick Bezuidenhout

P.O. Box 1667

Ngwese, Namibia

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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 attached page

**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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: [Signature] Date: 8/30/2016

*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.*

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).

ATLANTA, GA

9. 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):

SAME AS MAILING ADDRESS 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):

Jim Boone  
803-594-7363  
redh@bady@wildblue.net

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.

## Ndumo Safaris Enhancement Letter

Ndumo Safaris Ltd is a northeast Namibia based outfitter striving to combine sustained big game hunting with a focus on wildlife conservation within a vast concession of land. The concession is managed in an integrated approach with both the Namibian Government and local communal conservancies to enhance and benefit wildlife through conservation. This partnership approach with Ndumo and the communal conservancies which have been awarded a hunting quota have developed a successful model to help benefit both wild populations of target species and the local, impoverished communities to:

- 1) Co-exist on land with elephants and leopard
- 2) Derive a hunting based income from animals on land unsuitable for eco-tourism
- 3) Create core hunting areas with limited livestock entry, thus creating enhanced wildlife zones
- 4) Create 33 jobs with wages close to double the local standard
- 5) Provide communities with over 100 metric tons of much needed protein

Ndumo currently owns/operates two communal conservancies in the Caprivi/Zambezi region of Namibia:

- Sobbe conservancy
- Sikunga conservancy

Additionally, we operate Bwabwata East or Kwando Core area inside the Bwabwata National Park. The Namibian government has adopted integrated park management with the residents of the land on which the National Park is situated. Park residents are mostly from the Barakwena tribe, a Khwe San bushmen minority group. The residents have formed the Kyaramacan Association to represent them and manage income from tourism and trophy hunting. Ndumo has been awarded the trophy hunting concession from the Association.

Ndumo Safaris pays close to US\$ 550,000 to both the Namibian government and local communities in concession and license fees. Fully 60% of these fees generated by elephant and leopard hunting support conservation through local communities and the Game Products Trust Fund (GBTF). GBTF revenue is reinvested into wildlife management, conservation, rural development, and activities that are aimed at promoting the coexistence of humans and wildlife. Additionally, Ndumo pays the communities another US \$ 50,000 to further enhance and benefit wildlife by drilling bore holes, empowering local communities through anti-poaching efforts, purchasing game scout uniforms, and managing risks in areas of possible human/wildlife conflict further ensuring wild population sustainment.

The International Union for Conservation of Nature (IUCN) believes well-managed trophy hunting can “assist in furthering conservation objectives by creating the revenue and economic incentives for the management and conservation of the target species and its habitat, as well as supporting local livelihoods” and, further, that well-managed trophy hunting is “often a higher value, lower impact land use than alternatives such as agriculture or tourism.” When a trophy hunting program incorporates the following Guiding Principles, IUCN considers that trophy hunting can serve as a conservation tool: biological sustainability; net conservation benefit; socio-economic-cultural benefit; adaptive management—planning, monitoring, and reporting; and accountable and effective governance. We support this approach and are taking an active role in its implementation.



(b) (6)

STIFEL/ADVANTAGE

8/30/16 Date

PAY to the Order of U.S. Fish and Wildlife Service

One hundred \$ 100.00

The Bank of New York Mellon, 225 Liberty Street, New York, NY 10281

Expense Monitor ☐

For Permit - Insect Control

(b) (6)

MP

COLONIAL CLASSIC

10/18/16



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

OMB No. 1018-0164  
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

RCVD NOV 10 2016

LD

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 of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros

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 Price	1 b. First name Wendi	1 c. Middle name or initial (b) (6)	1 d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Occupation	4. Affiliation/ Doing business as (see instructions)	
5 a. Telephone number (b) (6)	5 b. Alternate telephone number	5 c. Fax number	5 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		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 Washington	1 c. State DC	1 d. Zip code/Postal code (b) (6)	1 e. County/Province	1 f. Country USA	
2 a. Mailing Address (include if different than physical address; include name of contact person if applicable)					
2 b. City	2 c. State	2 d. Zip code/Postal code	2 e. County/Province	2 f. Country	

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 15US73375B/9 No <input type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Signature of applicant/person responsible: Wendi Price (b) (6) Date of signature (mm/dd/yyyy): 11-7-16

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild:
- b. Date wildlife was hunted: November 3, 2016
- 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

- 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]:

Jaco Van De Merwe, Namibia Safaris Corporation, Box 336, Windhoek, Namibia

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 appear on the face of the export permit].

Name: Business            Namibia Safaris Corporation  
Name: Address:            Jaco Van De Merwe  
Address:                    Box 366  
City:                        Windhoek  
State/Province:            Namibia  
Country, Postal Code:    Phone: +264 (62) 572040 or +264 (0) 81 127 0906

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: Wendi Price (b) (6) Date: 11-7-16

*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.*

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 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):

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):

Wendi Price, (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.



RCVD NOV 10 2016

(b) (6)

Pay to the  
Order of US Fish & Wildlife Service Date 11-7-16 (b) (6)

One hundred dollars and 09 \$ 100.09

 **SECURITY NATIONAL BANK**  
P.O. Box 1272 • Enid, Oklahoma 73702  
(580) 234-5151

For (b) (6) Mendi (b) (6) AP

Secure Features  
Details on  
back



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 17 2017

LB

**Return to:** U.S. Fish and Wildlife Service  
Division of Management Authority (DMA)  
Branch of Permits, MS: 1A  
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.

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

<b>B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution</b>			
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

<b>C. All applicants complete address information</b>			
1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)			
1.b. City Midland	1.c. State Texas	1.d. Zip code/Postal code: (b) (6)	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			

<b>D. All applicants MUST complete</b>	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) _____ Date of signature (mm/dd/yyyy) 12/12/16	

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.  
Loxodonta Africana - African Elephant
  - 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):  
Namibia, Caprivi Strip , Nakabolelwa , S17°49.861 E24°52.936 , Ngoma
  - b. Date wildlife was hunted:  
09/18/2016

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

2 Tusks , 1 ear , 1 tail

- 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]:

Omujeve Safaris  
Ongombo West #56 , Windhoek Namibia

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: Corne Kruger  
Business Name: Omujeve Safaris  
Address: Ongombo West #56  
Address: Windhoek  
City: Namibia  
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:  Date: 12/1/16

*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):  
alredoe (Beau) Estes, (b) (6)  
(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.



(b) (6)

12/13/16 DATE

PAY TO THE ORDER OF V.S. Fush & Wally Davis \$ 100.00

one hundred & 00/100 DOLLARS

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

FOR 2016 Taxes, Nov. 17th

(b) (6)

RCVD JAN 17 2017



Permit Number: MA17865C-0  
Effective: 04/05/2017 Expires: 04/04/2018

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

*Mary Cogliano*  
FOR  
CHIEF, BRANCH OF PERMITS, DMA

Permittee:

ALDREDGE ESTES

(b) (6)

MIDLAND, TX (b) (6)  
U.S.A.

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

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 the sport-hunted trophy of one African elephant (*Loxodonta africana*), taken in Namibia for the purpose of enhancement of the survival of the species.
- B. Specimen may not be sold or transferred for any financial remuneration.
- C. U.S. Threatened Species: tusks must be marked as per [50 CFR 17.40(e)]. In accordance with the African Elephant Conservation Act, raw ivory, including sport-hunted trophies that are wholly or partially ivory, may not be re-exported from the U.S.
- D. Trophy must have been taken during the 2016 hunting season.
- E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit issued by the Management Authority of Namibia.
- 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 MAR 19 2018 LB



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  
(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 ALDREDGE	1 b. First name ESTES	1 c. Middle name or initial	1 d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation	5. Affiliation/ Doing business as (see instructions)
6 a. Telephone number (b) (6)	6 b. Alternate telephone number	6 c. Fax number	6 d. E-mail address

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 MIDLAND	1 c. State TX	1 d. Zip code/Postal code (b) (6)	1 e. County/Province	1 f. Country 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

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? MA17865C-0 Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.	
Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures)	Date of signature (mm/dd/yyyy) 3/16/18

**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 MA17865C-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: \_\_\_\_\_

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):  
Genus logisitcs 161-15 Rockaway blvd, Suite 205, Jamaica, ny 11434
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):

matthew Mayers 718 790 0216 matt@genuslogisitcs.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.



**Permit Number: MA17865C-0**  
Effective: 04/05/2017 Expires: 04/04/2018

**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

*Mary Coglianor*  
FOR  
CHIEF, BRANCH OF PERMITS, DMA

**Permittee:**

**ALDREDGE ESTES**

(b) (6)

MIDLAND, TX (b) (6)  
U.S.A.

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

**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 the sport-hunted trophy of one African elephant (*Loxodonta africana*), taken in Namibia for the purpose of enhancement of the survival of the species.
- B. Specimen may not be sold or transferred for any financial remuneration.
- C. U.S. Threatened Species: tusks must be marked as per [50 CFR 17.40(e)]. In accordance with the African Elephant Conservation Act, raw ivory, including sport-hunted trophies that are wholly or partially ivory, may not be re-exported from the U.S.
- D. Trophy must have been taken during the 2016 hunting season.
- E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit issued by the Management Authority of Namibia.
- 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).

# Genus Logistics Inc.

16115 Rockaway Blvd STE 205 Jamaica NY 11434

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

Individual U.S. Customs Service Individual

IRS / SS #

(b) (6)

☒ Individual

☐ Partnership

☐ Corporation

Partnership 141.32. C.R.

☐ Sole Proprietorship

## CUSTOMS POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS: That, ALDREDGE ESTE (b) (6) (Full Name of person, partnership, corporation, or sole proprietorship (Identify)) a corporation doing business under the laws of the State of TEXAS or a doing business as residing at (b) (6) MIDLAND TEXAS (b) (6) having an office and place of business at (b) (6) MIDLAND TEXAS (b) (6) hereby constitutes and appoints each of the following persons Genus Logistics Inc. may act through any of its offices 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 consigned 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. In 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. Or until revoked. Pursuant to 19 CFR 111.36(a), election is made waiving the right to receive invoices, supporting documents and correspondences from Genus Logistics Inc., who is directed to forward all documents and inquiries concerning our imports to their customs brokerage services, to our freight forwarder, who will pay Genus Logistics Inc., for duties, and services performed on our behalf. It is understood the right to revoke said waiver.

IN WITNESS WHERE OF, the said (Print name) ALDREDGE ESTE (b) (6)

has caused these presents to be sealed and signed:

(Signature) (b) (6)

(Capacity) SALT

(Date) 1/23/18

WITNESS Rach Cortez

Complete this form in full and send back to Genus Logistics with:  
**Completed POA power of attorney and a copy of your passport or drivers license**

**EMAIL:** matt@genuslogistics.com

**MAIL:** Genus Logistics 76 Albany Blvd Atlantic Beach NY 11509

**FAX:** 516 400 9787

<u>ESITES</u>	(b) (6)	<u>ALDREDGE</u>	
Last Name		First Name	MI
(b) (6)	<u>USA</u>	(b) (6)	
Passport #	Country of Issue	Date of Birth	
(b) (6)	<u>MIDLAND</u>	<u>TX</u>	(b) (6)
Physical Address (*Required)	City	State	Zip
(b) (6)	<u>MIDLAND</u>	<u>TX</u>	(b) (6)
Mail Address			Zip
(b) (6)			
Work Phone	Cell	Home Phone	
<u>/</u>	(b) (6)		
Fax	E-Mail		

**DELIVERY INFO:**

Taxidermist / Tannery or Yourself (If business c/o business name)

(b) (6)	<u>MIDLAND</u>	<u>TX</u>	(b) (6)
Physical Address (No P.O. BOX)	City	State	Zip
(b) (6)			
Delivery Contact: Phone	Liftgate Required?	<u>✓</u> Yes	



*Of the United States,  
in Order to form a more perfect Union,  
establish Justice, insure domestic Tranquility,  
provide for the common defence,  
promote the general Welfare, and secure  
the Blessings of Liberty to ourselves and  
our Posterity, do ordain and establish this  
Constitution for the United States of America.*



Aldredge Estate 

SIGNATURE OF BEARER / SIGNATURE DU TITULAIRE / FIRMA DEL TITULAR

**PASSPORT  
PASSEPORT  
PASAPORTE**

# UNITED STATES OF AMERICA

Type 1/Type 1/Type

Care / Caringo

Passport No./ No. du Passeport

1

**USA**

(b) (6)

Surname / NOST. ADDRESS

**ESTES** (b)  
(6)

**Given Names / Prénoms / Nombres**

**ALDREDGE**

Nationality / Nationalité / Nacionalidad

UNITED STATES OF AMERICA

**Date of birth / Date de naissance / Fecha de nacimiento**

(b) (6)

Place of birth / Lieu de naissance / Lugar de nacimiento

**TEXAS, U.S.A.**

Date of issue / Date de délivrance / Fecha de expedición

04 Jun 2012

Date of expiration / Date d'expiration / Fecha de caducidad

03 Jun 2022

Endorsements / Mentions Spéciales / Anotaciones

**SEE PAGE 27**

United States

**Department of State**

USA

**P<USAESTES**

[illegible]



THIS DOCUMENT HAS A COLORED BACKGROUND AND MICROPRINTING. THE REVERSE SIDE INCLUDES AN ARTIFICIAL WATERMARK

Genus Logistics Inc.  
161 15 Rockaway Blvd Suite 205  
Jamaica NY 11434  
Tel: 718 790 0218

Chase  
JP Morgan Chase Bank, N.A.  
www.chase.com

(b) (4)

DATE 03/16/18

PAY **United States Fish and Wildlife Services**

\$ **\*\*100.00**

**ONE-HUNDRED AND 00/100\*\*\*\*\***

**DOLLARS**

PAY TO **United States Fish and Wildlife Services**  
THE ORDER **5275 Leesburg Pike**  
OF **Falls Church, VA 22041-3803**

Memo **ALDREGE PERMIT 11433**

(b) (4)



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

OMB No. 1018-0164  
Expires 11/30/2016

**Federal Fish and Wildlife Permit Application Form**

RCVD FEB 13 2017

LB

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

**Type of Activity:**  
**Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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 Frank	1 b. First name David	1 c. Middle name or initial (b) (6)	1 d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Occupation	4. Affiliation/ Doing business as (see instructions)	
5 a. Telephone number (b) (6)	5 b. Alternate telephone number	5 c. Fax number	5 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) N/A		
2. Tax identification no. N/A	3. Description of business, agency, Tribe, or institution N/A		
4 a. Principal officer Last name N/A	4 b. Principal officer First name N/A	4 c. Principal officer Middle name/ initial N/A	4 d. Suffix N/A
5. Principal officer title N/A		6. Primary contact name N/A	
7 a. Business telephone number N/A	7 b. Alternate telephone number N/A	7 c. Business fax number N/A	7 d. Business e-mail address N/A

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 Massillon	1 c. State Ohio	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) N/A				
2 b. City N/A	2 c. State N/A	2 d. Zip code/Postal code N/A	2 e. County/Province N/A	2 f. Country 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 <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 08US175702/9 No <input type="checkbox"/>
3.	Certification. I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. (b) (6) at any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Signature of applicant/person responsible: [Signature] Date of signature (mm/dd/yyyy): 01/23/2017

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 01 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: N/A (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: N/A (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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 - Bikita District, Save Valley Conservancy - Masvingo Province - Mokore S 20, 40441, E 32, 11777 - Mokore Ranch and Umkondo Ranch - Masvingo

- b. Date wildlife is to be hunted:

April 12, 2017 through April 25, 2017

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

Leopard skin, claws and skull

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild:
- 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 document]:

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 appear on the face of the export permit].

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

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported in (b) (6) States, cannot be re-exported.

Applicant's signature: David [redacted] Frank Date: 1/23/2017

*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 government to conduct your propose activity. While the Service will attempt to assist where possible, 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 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):

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.



**APPLICATION FOR A FEDERAL FISH AND WILDLIFE PERMIT**

Application being submitted by: David (b)(6) Frank

**Section E: Question #5:**

Mokore Safaris is paid a fee by the hunter for each leopard harvested in Save Valley Conservancy.

Mokore Safaris pay a monthly levy to the Save Valley Conservancy to operate the Conservancy.

Part of this monthly levy is used to fund research programs taking place within the Save Valley Conservancy such as wild dog rehabilitation, and the reintroduction of white and black rhino.

Part of the monthly levy paid to Save Valley Conservancy is used to pay for anti-poaching scouts.



# CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

## IMPORT PERMIT

Page 1 of 1

1. Original Permit/Certificate No.

08US175702/9

2. Valid until

04/02/2009

## 3. Permittee (name and address, country)

DAVID (b) FRANK

(b) (6)

MASSILLON, OH (b) (6)  
U.S.A.

## 4. Consignee (name and address, country)

JONATHAN HULME  
ZAMBEZI HUNTERS  
19 ROLFE AVENUE  
BALLANTYNE PARK  
HARARE  
ZIMBABWE

## 5. Special Conditions

MUST COMPLY WITH ATTACHED GENERAL PERMIT CONDITIONS.

MAY NOT BE USED FOR PRIMARILY COMMERCIAL PURPOSES.

U.S. THREATENED SPECIES [50 CFR 17.40(f)].

MUST IMPORT THROUGH A DESIGNATED PORT LISTED IN CONDITION 10.  
PERMITTEE CAN ONLY IMPORT TWO LEOPARD TROPHIES PER CALENDAR YEAR.

EACH LEOPARD SKIN MUST HAVE SELF-LOCKING TAG ATTACHED TO IT WHICH INDICATES THE STATE OF EXPORT, THE NUMBER OF THE SPECIMEN IN RELATION TO THE ANNUAL QUOTA, AND THE CALENDAR YEAR TO WHICH THE QUOTA APPLIES. THE EXPORT PERMIT (OR RE-EXPORT CERTIFICATE) MUST CONTAIN THE TAGGING INFORMATION AS OUTLINED ABOVE.

*-May not be used for commercial purposes. -For live animals, only valid if the transport conditions comply with the CITES Guidelines for Transport of Live Animals or, in the case of air transport, with IATA Live Animals Regulations.*

## 5a. Purpose of Transaction

H

## 5b. Security No.

110179

## 6. U.S. Management Authority

DIVISION OF MANAGEMENT AUTHORITY  
U.S. FISH AND WILDLIFE SERVICE  
DEPARTMENT OF THE INTERIOR  
WASHINGTON, D.C. 20240  
UNITED STATES OF AMERICA

04/03/2008

Issuing Date

United States Management Authority

AUTHORITY: Endangered Species Act of 1973 (16 USC 1531 et. seq.)

## 7/8. Common Name and Scientific name (genus and species) of Animal or Plant

## 9. Description of Part or Derivative, including identifying marks or numbers (age/sex if live)

## 10. Appendix No. and Source

## A. Common Name

LEOPARD

9. IMPORT PERSONAL SPORT-HUNTED TROPHY SKIN, CLAWS AND SKULL MUST HAVE BEEN TAKEN DURING THE 2008 HUNTING SEASON.

10. 1 W

11. Quantity (including units)

1

NO

## Scientific Name

PANTHERA  
PARDUS12. Country of Origin  
ZIMBABWE

## B. Common Name

9.

10.

11. Quantity (including units)

## Scientific Name

12. Country of Origin

## C. Common Name

9.

10.

11. Quantity (including units)

## Scientific Name

12. Country of Origin

## D. Common Name

9.

10.

11. Quantity (including units)

## Scientific Name

12. Country of Origin

## E. Common Name

9.

10.

11. Quantity (including units)

## Scientific Name



12. Country of Origin

Specimen(s) will not be used for primarily commercial purposes. The recipient has suitable facilities to house and care for the specimen(s).

(b) (6)

PAY to the  
Order of U.S. Fish and Wildlife Service 1/23/17 Date

ONE HUNDRED 00/100 \$ 100.00

 **Huntington** Dollars  Photo  
Safe  
Deposit  
Details on back

For EXPORT (b) (6) (b) (6) (b) (6)

COLOMB CLASS-CP

RCVD FEB 13 2017



### NOTICE OF REPRESENTATION


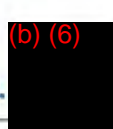
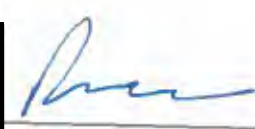
This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for one permit to import a lawfully hunted African lion trophy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

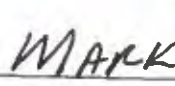

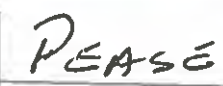
I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophies at the following address:

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](mailto:cf@conservationforce.org)

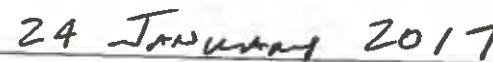
Signed:

Name:

Date:





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

OMB No. 1018-0164  
Expires 11/30/2016

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 of**  
**~~Southern African Leopard~~ African Elephant, and**  
**Namibian Southern White Rhinoceros**

Received on  
March  
7, 2017  
LB

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

A. Complete if applying as an individual			
1.a. Last name Pease	1.b. First name Mark	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Occupation	4. Affiliation/ Doing business as (see instructions)	
5.a. Telephone number (b) (6)	5.b. Alternate telephone number	5.c. Fax number	5.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		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 Woodlands	1.c. State Texas	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province 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 <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 1545756488/9 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Signature of applicant/person for permit (No photocopied or stamped signatures) <i>[Signature]</i> Date of signature (mm/dd/yyyy) 1/24/2017	

Please continue to next page



**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.** .

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, Chifunda GMA, Muchinga Adventures Concession, closest city is Lusaka

- b. Date wildlife is to be hunted:

August 2017

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, 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/or AND nearest city) where trophy was removed from the wild:
- 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):
- 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]:

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 appear on the face of the export permit].

Name: Business Muchinga Adventures Ltd.  
Name: Address: P.O. Box 390003  
Address: Lumumba Road  
City: Lusaka  
State/Province: Zambia  
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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 enhancement information provided by Conservation Force, range state authorities, hunting 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.~~

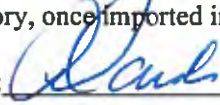
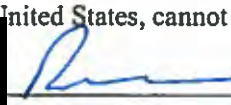
~~I acknowledge that the sport hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand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

Applicant's signature:

 (b) (6) 

Date:

1/24/2017

*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 government to conduct your propose activity. While the Service will attempt to assist where possible, 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 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):

same as page one

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):

Applicant or John J. Jackson, III or Regina Lennox of 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.



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 MAR 16 2017

LP

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

Type of Activity:  
Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros

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 Suggs	1 b. First name Fred	1 c. Middle name/initial (b) (6)	1 d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions) N/A
6 a. Telephone number (b) (6)	6 b. Alternate telephone number (b) (6)	6 c. Fax number (b) (6)	6 d. E-mail address (b) (6)

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

C. All applicants complete address information			
1 a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes) (b) (6)			
1 b. City Greenville	1 c. State SC	1 d. Zip code/Postal code (b) (6)	1 e. Country 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. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: Unknown No <input type="checkbox"/>	
3. Certification. I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter 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 understanding. I understand that any false statement or omission may subject me to the criminal penalties of 18 U.S.C. 1001. Signature (in blue ink) of Fred Suggs Date of signature (mm/dd/yyyy) March 9, 2017	

Please continue to next page



- 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 document]:

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 appear on the face of the export permit].

Name: *Alistair Pole, Director*  
Business Name: *Zambezi Hunters (PVT) LTD*  
Address: *PO Box BW 1330*  
Address:  
City: *Borrowdale*  
State/Province: *Harare, Zimbabwe*  
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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:** \_\_\_\_\_

*[Signature]* (b) (6) *[Signature]* (b) (6)

**Date:** *March 9, 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 government to conduct your propose activity. While the Service will attempt to assist where possible, 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 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):

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):

Applicant: Fred (b) (6) Suggs, (b) (6)  
(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.

(b) (6)

(b) (6)

March 9, 2017 DATE

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

One Hundred and 00/100 DOLLARS

First Citizens  
First Citizens Bank & Trust Company, Inc.

FOR (b) (6)

Freddie L. Rogers Jr.



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

OMB No. 1018-0164  
Expires 11/30/2016

# Federal Fish and Wildlife Permit Application Form

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

**Type of Activity:**  
**Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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 <b>Cuppy</b>	1 b. First name <b>Barbara</b>	1 c. Middle name or initial <b>(b) (6)</b>	1 d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Occupation <b>(b) (6)</b>		
4. Affiliation/ Doing business as (see instructions)			
5 a. Telephone number <b>(b) (6)</b>	5 b. Alternate telephone number <b>(b) (6)</b>	5 c. Fax number <b>(b) (6)</b>	5 d. E-mail address <b>(b) (6)</b>

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>(b) (6)</b>					
1 b. City <b>Souderton</b>	1 c. State <b>PA</b>	1 d. Zip code <b>(b) (6)</b>	1 e. Country/Province <b>(b) (6)</b>	1 f. Country <b>USA</b>	
2 a. Mailing Address (include if different than physical address, include name of contact person if applicable)					
2 b. City	2 c. State	2 d. Zip code/Postal code	2 e. County/Province	2 f. Country	

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <b>(b) (6)</b> <i>Barbara Cuppy</i> Signature of applicant/person responsible for this application (No photocopied or stamped signatures)	
Date of signature (mm/dd/yyyy) <b>03/13/2017</b>	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: one (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: N/A (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: N/A (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

N/A

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: Block 18 of the Niassa National Reserve, Cabo Delgado Province, N. Mozambique, S 12.26853 E 38.42109, Montepuez, Cabo Delgado Province, Mozambique
- b. Date wildlife was hunted: 10/11/2016
- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks): Skull, Skin (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 document]:  
Avenida Samora Machel, Estrada Nacional Nr.4  
Bairro de Tchumen 11, Parcela 3.380/2/1  
Pavilhao 13/ Matola, Mozambique

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 appear on the face of the export permit].

Name: Business Safari Cargo Systems, IDA  
Name: Address: Avenida Samora Machel, Estrada Nacional Nr.4  
Address: Bairro de Tchumen 11, Parcela 3.380/2/1 Pavilhao 13  
City: Matola  
State/Province: Maputo  
Country, Postal Code: Mozambique  
Tel/Fax: 21480550/844820//Email: Info.moz@safaricargo.com

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: Barbara Cuppy Date: 03/13/2017

*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 government to conduct your propose activity. While the Service will attempt to assist where possible, 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).

New York, NY  
70 E. Sunrise Hwy. #419  
Valley Stream, New York 11580  
Phone: (516) 825-3950 Fax: (516) 825-1929

9. 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):

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):

Barbara Cuppy

(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.

- Block B / L8  
Niassa Reserve  
Cabo Delgado Province  
Northern Mozambique



Tel/Fax: +27 41 368 8013  
SA Cell: +27 73 489 4019  
Moz Cell: +258 82 098 1880  
www.kambakosafaris.com  
SKYPE: "jumbosafaris"  
jumbo@kambakosafaris.com

6<sup>th</sup> March 2017

U.S. Fish & Wildlife Services

Attention: FWS Wildlife Inspector

REF: Leopard hunted by Barbara Cuppy in Mozambique

Dear Sir / Madam,

I am Jumbo Moore the Managing Director of Kambako Safaris. Mrs Barbara Cuppy successfully hunted a fully mature male leopard within Block B / L8 of the Niassa Reserve in Northern Mozambique in October 2016.

The size of the hunting concession is over 590,000 acres. In the past 13 years, we have been 95% successful on all our leopard hunts and we have never shot a female nor young male leopard. All my PH's use trail camera's to judge the possible cat before it is actively hunted. We have a minimum of 18 game scouts on the ground at any one time and annually we are spending in excess of \$140,000 on anti-poaching.

Block B / L8 does not have any communities living within it but we do have migrant fisherman along the Lugenda River which require continual patrolling. We do have a village in Coutada Nicage called Xixano. Our community development program for Xixano and its residents include:

- Employment opportunities of in excess of 70 local people from the surrounding areas
- Training and passing on of skills to them in which include: law enforcement, animal tracking, skinning, camp running, carpentry, building, road construction and maintenance etc
- 20% of all our animal licence fees collected are deposited into the Community's bank account
- Regular distribution of meat from the game animals hunted to the community
- We sunk and maintain a borehole (water well) that provides fresh water to the villagers

The above points all assist in keeping the community busy and happy and away from poaching.

All our game populations (apart from Elephant) have dramatically increased over the past 13 years since we took over the running of Block B / L8. With the numbers of prey species increasing, our cat predator numbers have increased as well.

Kambako Safaris – Block B / L8 is a true example that controlled hunting does allow sustainable utilization of Wildlife to the benefit of the local communities.

---

Directors  
S. Bates, T. Dasher, J. McCollum, J. Moore, C. Williams

Below is a map of the concession area. The yellow lines are all roads that we have made in the last 13 years. The roads have allowed us to access new areas, have allowed our anti-poaching teams to patrol the concession better and have allowed us to hunt cats all over the concession and not just in small areas around the safari camps.



If you have any questions, please don't hesitate to contact me.

Yours sincerely,

Jumbo Moore

MANAGING DIRECTOR


RCVD MAR 17 2017


60-7318-2313

**CHESTNUT HOUSE ASSOCIATES**  
12 FAIRHILL ROAD  
SOUDERTON, PA 18964

DATE 3/13/17

Pay to the order of U.S. Fish & Wildlife Service \$ 100.00  
one hundred and 00/100 Dollars

 **FIRST SAVINGS BANK**  
BOX 176  
PERKASIE, PA 18944

Barbara Cuppy  Security Features  
Embossed, Check on Back

(b) (4)



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: 1A  
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 White	1.b. First name Stevan	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions)
6.a. Telephone number (b) (6)	6.b. Alternate telephone number (b) (6)	6.c. Fax number (b) (6)	6.d. E-mail address (b) (6)

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

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

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification I hereby certify that I have read and understand the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter D 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 (in blue ink) of applicant/representative	Date of signature (mm/dd/yyyy) 03/10/2017

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.

Panthera pardus pardus African Leopard

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):

Gokwe South Communal Land Campfire concession City-Gokwe, Midlands Province, Country- Zimbabwe  
GPS Coords.....S 18 04 51 13 E028 14 34 59

b. Date wildlife was hunted:

October 23,2016

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

Skin with claws attached 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]:

Colletts Taxidermy, 15 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: Michelle Nash  
Business Name: Outbound Cargo and Trophy Exporters  
Address: 5 Grantham Road  
Address: Belmont  
City: Bulawayo  
State/Province: 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 have advised that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:  Date: 03/10/2017

*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):

Stevan (b) (6) White (b) (6) Willow Alaska (b) (6)  
(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.

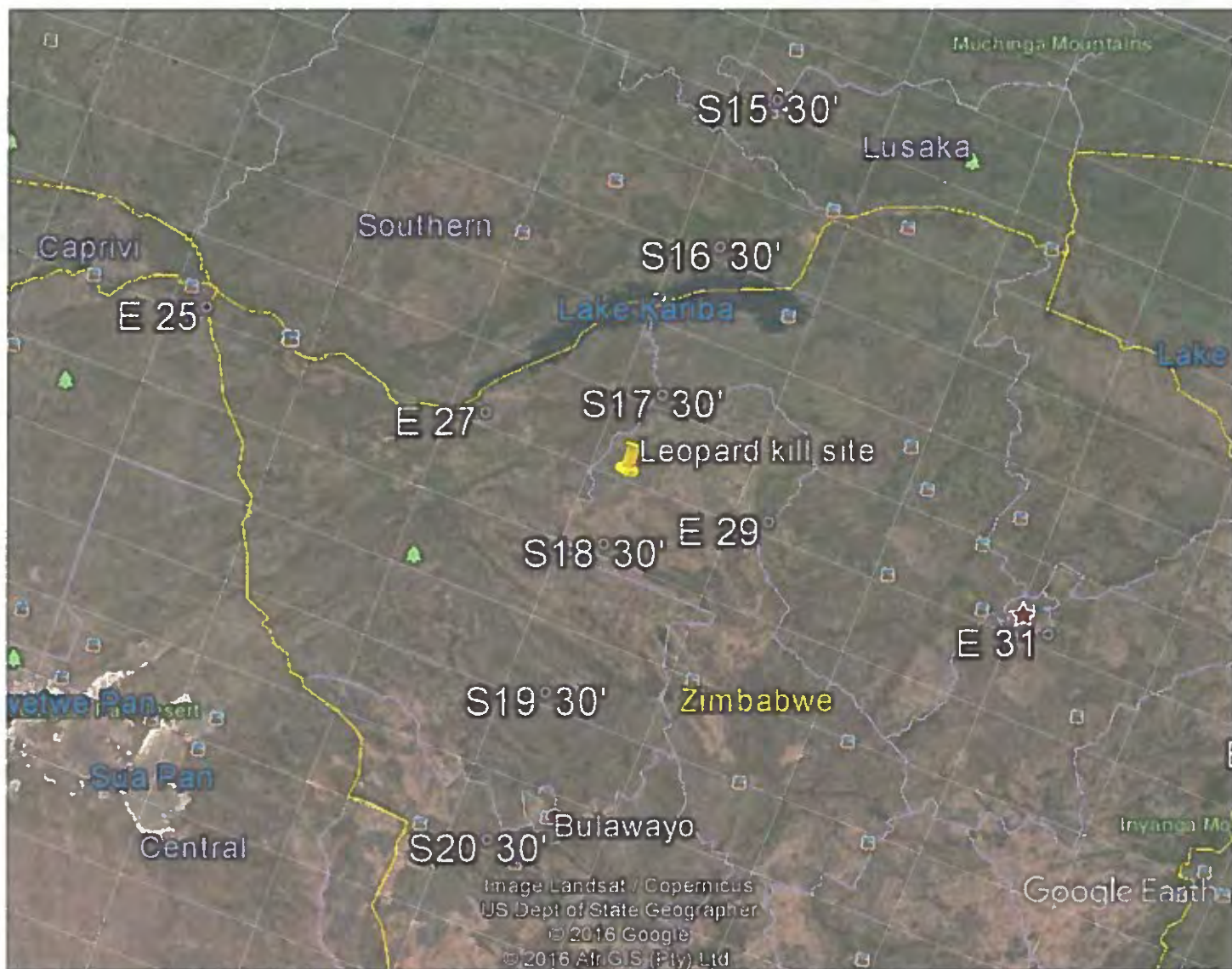
☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

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

(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.



Google Earth



The wild population of leopards in this area is benefitted by the limited hunting of leopards in this area. The area we hunted was on tribal lands and all trophy fees were paid to the local tribal council. These people are very poor and leopards prey on their livestock. If it were not for them receiving very large sums of money for the harvest of a leopard these people would poison the entire population. This is a large area and we tracked at least 6 different leopards in the 3 days we hunted there. The government of Zimbabwe has set the quota for this area to just one leopard a year and only a male may be taken anywhere in Zimbabwe. Zimbabwe is also collecting information from every leopard harvested and pictures of the body, genitals, teeth and skull must be sent so they can do research on leopard populations. The only way they can study these specimens is with limited hunting. They also collect data on how many leopards are tracked and seen on every hunt. Since only males are harvested it helps the population increase since male tend to kill the cubs.



RCVD MAR 17 2017

(b) (6)

(b) (6)

3/10/2017

Date

Pay to the  
Order of

U.S. Fish + Wildlife Service \$ 100.00

one-hundred dollars + 00/100

Dollars



Phone  
Safe  
Deposit  
Details on back

WELLS  
FARGO

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

For

Cites Permit

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(b) (6)



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 MAR 27 2017

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

**Type of Activity:**  
**Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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.

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

<b>B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution</b>			
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

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

<b>D. All applicants MUST complete</b>	
1. Attach check or money order payable to the U S FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in Instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue 03US068871/9 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter 1 of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) 03/21/2017 Date of signature (mm/dd/yyyy)	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**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 were 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:** The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: <sup>N/A</sup> \_\_\_\_\_ (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: <sup>1</sup> \_\_\_\_\_ (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: <sup>N/A</sup> \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

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, Otjozondjupa Region, N#A JAQNA Conservancy, "Bushmanland",

- b. Date wildlife is to be hunted:

July 15, 2017 to July 31, 2017

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

Skin, Skull, Teeth, Tusks, Bones, Feet

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: 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 document]:

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 appear on the face of the export permit].

Name:

Business Name: Thormahlen & Cochran Safaris Namibia

Address: 92 Nelson Mandela Avenue

Address: Stillwaters no 5

City: Klein Windhoek

State/Province: Namibia

Country, Postal Code: (Namibia does not have postal codes)

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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: 03/21/2017

*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 government to conduct your propose activity. While the Service will attempt to assist where possible, 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 PLAN TO USE LOUISVILLE, KY*

9. 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):

Danny (b) Spindler

(b) (6) (6)

Evansville, IN (b) (6)  
USA

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):

Danny M Spindler

(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.

N/A



(b) (6)

70-2259  
812 4000

(b) (6)


DATE 3/21/17

PAY TO THE ORDER OF U.S. Fish & Wildlife Service

One Hundred No / 100

\$ 100 <sup>00</sup>

DOLLARS

 **Banterra Bank**  
www.banterra.com

MEMO \_\_\_\_\_

(b) (6)

MP

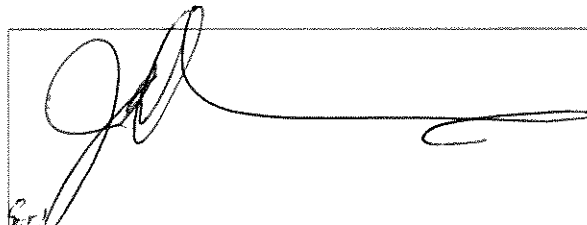
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Security Features  
Printed on Demand



**Permit Number: MA28045C-0**  
Effective: 04/20/2017 Expires: 04/19/2018

**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:**

DANNY (b) (6) SPINDLER

(b) (6) (b) (6)  
EVANSVILLE, IN (b) (6)  
U.S.A.

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

**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 the sport-hunted trophy of one African elephant (*Loxodonta africana*), taken in Namibia for the purpose of enhancement of the survival of the species.
- B. Specimen may not be sold or transferred for any financial remuneration.
- C. U.S. Threatened Species: tusks must be marked as per [50 CFR 17.40(e)]. In accordance with the African Elephant Conservation Act, raw ivory, including sport-hunted trophies that are wholly or partially ivory, may not be re-exported from the U.S.
- D. Trophy must have been taken during the 2017 hunting season.
- E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit issued by the Management Authority of Namibia.
- 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

**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 of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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 <b>Dinges</b>	1.b. First name <b>Dan</b>	1.c. Middle name or initial <b>(b) (6)</b>	1.d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Occupation <b>(b) (6)</b>		
4. Affiliation/ Doing business as (see instructions) <b>n/a</b>			
5.a. Telephone number <b>(b) (6)</b>	5.b. Alternate telephone number <b>(b) (6)</b>	5.c. Fax number <b>(b) (6)</b>	5.d. E-mail address <b>(b) (6)</b>

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution <b>n/a</b>		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>(b) (6)</b>					
1.b. City <b>Houston</b>	1.c. State <b>TX</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>U.S.A.</b>	
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) <b>n/a</b>					
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country	

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: <b>13US95660A/9</b> No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <b>(b) (6)</b> <b>Dinges</b> Signature of applicant responsible for permit (No photocopied or stamped signatures) <b>3-29-2017</b> Date of signature (mm/dd/yyyy)	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: n/a (Import is limited to two per hunter per calendar year)  
**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: n/a (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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; Upper Lupande game management area in the Luangwa Valley Region. Nearest city is Mfuwe.  
Area HQ gps coordinates - south 13° 01.954'; east 031° 53.100'
  - b. Date wildlife is to be hunted:

August 19, 2017 - September 2, 2017

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

Skull and fullskin

3. **IF THE ANIMAL IS DEAD**, please enter the following:

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

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):

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

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 appear on the face of the export permit].

Name: Business                      Bangweulu Taxidermy Limited  
Name: Address:                    4142/K Chifwema Road  
Address:                            New Kasama, Lusaka  
City:                                 Zambia  
State/Province:  
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: \_\_\_\_\_

(b) (6)

Date: 3.29.2017

*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 government to conduct your propose activity. While the Service will attempt to assist where possible, 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 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):

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):

(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.



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 APR 5 2017

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

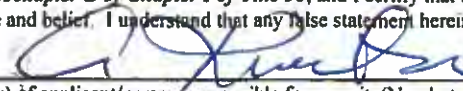
Type of Activity:  
Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros

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 Knowlton	1.b. First name Amber	(b) (6) Name or initial	1.d. Suffix
(b) (6) mm/dd/yyyy	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)	6.b. Alternate telephone number NA	6.c. Fax number 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)	
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 #, or P.O. Box)				
(b) (6)				
1.b. City Rockwall	1.c. State Texas	1.d. Zip code/Postal code (b) (6)	1.e. County/Province	1.f. Country USA
2.a. Mailing Address (include if different than physical address, include name of contact person if applicable)				
Same				
2.b. City Same	2.c. State Same	2.d. Zip code/Postal code Same	2.e. County/Province Same	2.f. Country 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.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? <del>No</del> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) 1-23-17

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**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 were 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:** The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: \_\_\_\_\_ (Limited to the import of two per calendar year)  
0

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**  
0

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

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, horns, tusks).
3. **IF THE ANIMAL IS DEAD**, please enter the following:
  - a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: Tanzania, Maswa Kimali Game Reserve, Shinyanga Region
  - b. Date wildlife was hunted:  
August 27, 2014

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

1 x skull, 1 x full skin and 2 x collar 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 document]:

Tanzania Game Tracker Safaris, Selian Coffee Estate, Namanga Road, 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 appear on the face of the export permit].

Name:  
Business Name: Tanzania Game Tracker Safaris  
Address: Selian Coffee Estate  
Address: Namanga Road  
Address: Arusha  
City: Tanzania  
State/Province:  
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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: 1-2-17

*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.*

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).

San Francisco, California

9. 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):

Please use prepaid envelope included:

(b) (6)

(b) (6)

Rockwall, 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):

Amber (b) (6) Knowlton

Phone: (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.




RCVD APR 5 2017


(b) (6) 32-1797/1110 (b) (6)

DATE 1-2-17 MP  Shield™

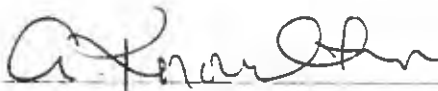
PAY TO THE ORDER OF U.S. Fish and Wildlife \$ 100.00

one hundred dollars + 00/100 DOLLARS

 Heat Reactive Ink

 **TEXAS CAPITAL BANK®**  
Dallas, Texas

MEMO \_\_\_\_\_

(b) (6)  MP



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

OMB No 1018-0093  
Expires 05/31/2017

MAY 2 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: 1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

Type of Activity:  
**IMPORT OF SPORT-HUNTED TROPHIES OF ARGALI**

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 Liautaud	1.b. First name James	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Business/Doing business as (see instructions) (b) (6)			
3. Business/Doing business as (see instructions) (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 Champaign	1.c. State IL	1.d. Zip code (b) (6)	1.e. Country USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)			
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province
2.f. Country			

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100 nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA95855B-0; MA95854B-0 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter 1 of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.	
Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures)	Date of signature (mm/dd/yyyy) 04/21/2017

## E. IMPORT OF SPORT-HUNTED TROPHIES OF ARGALI

**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 were 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.** This form should be used only if you intend to hunt in Mongolia, the Kyrgyz Republic (Kyrgyzstan), and the Republic of Tajikistan (Tajikistan) that has annual quotas on the take of argali. Any permits issued will be conditioned that the permit is valid only if, at the port of entry, evidence from the conservation agency in the country of origin is presented showing that the trophy was part of that quota (e.g., copy of hunting license). If you are hunting in a different country, please use form 3-200-20 <http://www.fws.gov/international/permits/by-form-number/index.html>.

**Note 3.** Typically the Service receives more applications for permits than we are able to issue. In order to create the most equitable distribution system for issued permits, we have developed a specific procedure for accepting and ranking argali applications. Please see a discussion of this procedure on our website (<http://www.fws.gov/international/permits/by-form-number/index.html>).

**Note 4.** This permit will require a report on your hunt that must be submitted within 30 days of the import of your trophy. If you do not import a trophy you must return the unused permit. No further permits can be issued until this requirement is fulfilled.

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 submit, please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 2 through 6 for each trophy addressed in the application.

1. ENTER the quantity next to the name of Argali subspecies you are applying to import:

Argali (Marco Polo Sheep) ( <i>Ovis ammon poli</i> )	Quantity:	<u>1</u>
Argali (Altai Sheep) ( <i>Ovis ammon ammon</i> )	Quantity:	<u>      </u>
Argali (Gobi Sheep) ( <i>Ovis ammon darwini</i> )*	Quantity:	<u>      </u>

\*Includes Hangai argali (the Service does not consider this to be a separate subspecies from *O. a. darwini*)

2. Date (MM/DD/YY) wildlife was (or is to be) taken: N/A

3. **IF THE TROPHY IS ALREADY TAKEN,**

a. Country and place (e.g., area, region, GIS coordinates, or hunting camp AND nearest city/town) where the argali was taken (provide a map if possible).  
N/A

b. A complete description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, horns). The permit will specifically identify all items being imported. This information must also match what appears on the export permit:  
N/A

- c. The current location of the trophy (address and country):

Name: N/A

Address:

City:

State/Provide:

County, Postal Code:

4. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD,**

- a. Country and place (e.g., area, region, GIS coordinates, or hunting camp, AND nearest city/town) where the argali is intended to be taken. Please be specific and provide a map, if available.  
Khovd Province or Bayan-Ulgii Province

- b. A complete description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, horns). The permit will specifically identify all items being imported. This information must also match what appears on the export permit:  
1 full skin, 1 skull, 1 set horns, 1 set hooves

5. From which country do you intend to export/re-export the specimen, if different from the country of origin?  
N/A

6. The U.S. Fish and Wildlife Service must make certain determinations under the U.S. Endangered Species Act before an import permit can be issued. If you have information (e.g., recent population surveys of argali in the area where you will hunt/have hunted; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation) that would support our findings, submit this information below or on a separate page with your application.

7. **CERTIFICATION STATEMENT** (original signature must be provided)

I acknowledge that the sport-hunted argali trophy(ies) 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**).

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 where possible, 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 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):  
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): Tracey Hall, 630-973-7209, thall@jimmyjohns.com  
Shikar Safaris +90 242 226 31 35, info@shikarsafaris.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.



(b) (6)

(b) (6)

(b) (6)

NUMBER

(b) (6)

63-8413/2870

PAY:

One Hundred Dollars And 00 Cents

DATE

AMOUNT

4/21/2017

\$100.00

TO THE  
ORDER  
OF

U.S. Fish and Wildlife Service  
5275 Leesburg Pike  
Falls Church VA 22041

*Mary Hall*

(b) (6)

THIS DOCUMENT CONTAINS HEAT SENSITIVE INK. TOUCH OR PRESS HERE. RED IMAGE DISAPPEARS WITH HEAT.



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 of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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 <b>EASTERBROOK</b>	1.b. First name <b>ROBERT</b>	1.c. Middle name or initial <b>(b) (6)</b>	1.d. Suffix <b>(b) (6)</b>
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Occupation <b>(b) (6)</b>	4. Affiliation/ Doing business as (see instr <b>(b) (6)</b>	
<b>(b) (6)</b>			

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>(b) (6)</b>			
1.b. City <b>MADISON HEIGHTS</b>	1.c. State <b>MI</b>	1.d. Zip code/Postal code: <b>(b) (6)</b>	1.e. Country/Province <b>USA</b>
2.a. Mailing Address (include if different than physical address, include name) <b>SAME</b>			
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province
			2.f. Country

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee — attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue <b>116US05274C/9</b> No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. <b>(b) (6)</b> I understand that any false statement hereon <b>(b) (6)</b> subject me to the criminal penalties of 18 U.S.C. 1001. <b>Robert Easterbrook</b> Signature of applicant/person responsible for permit (No photocopied or stamped signatures) <b>7-12-17</b> Date of signature (mm/dd/yyyy)	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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:

NIASSA BLOCK R3, LUAMBEZE/MAZEZE, NIASSA PROVINCE  
MOZAMBIQUE

- b. Date wildlife is to be hunted:

AUGUST 18, 2017

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

Full SKIN, CLAWS, SKULL

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild:
- 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 document]:

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 appear on the face of the export permit].

Name: Business

Name: Address:

Address:

City:

State/Province:

Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:

*Robert [REDACTED] Gustafson* [REDACTED] (b) (6) (b) (6) Date: 7-12-17

*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.*

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 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):

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.





# CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

## IMPORT PERMIT

Page 1 of 1

1. Original Permit/Certificate No.

16US05274C/9

2. Valid

09/29/2017

## 3. Permittee (name and address, country)

ROBERT (b) (6) EASTERBROOK (b) (6)  
(b) (6)  
TROY, MI (b) (6)  
U.S.A. (b) (6)

## 4. Consignor (name and address, country)

TROPHY CONSULTANT INTERNATIONAL  
4 JOSIAH CHINAMANO ROAD  
BELMONT, BULAWAYO  
ZIMBABWE

## 5. Special Conditions

MUST COMPLY WITH ATTACHED GENERAL PERMIT CONDITIONS

SPECIMEN MAY NOT BE SOLD OR TRANSFERRED FOR ANY FINANCIAL REMUNERATION.

U.S. THREATENED SPECIES [50 CFR 17.40(f)].

MUST IMPORT THROUGH A DESIGNATED PORT LISTED IN CONDITION 10. PERMITTEE MAY ONLY IMPORT TWO LEOPARD TROPHIES PER CALENDAR YEAR.

EACH LEOPARD SKIN MUST HAVE SELF-LOCKING TAG ATTACHED TO IT WHICH INDICATES THE STATE OF EXPORT, THE NUMBER OF THE SPECIMEN IN RELATION TO THE ANNUAL QUOTA, AND THE CALENDAR YEAR TO WHICH THE QUOTA APPLIES. THE EXPORT PERMIT (OR RE-EXPORT CERTIFICATE) MUST CONTAIN THE TAGGING INFORMATION AS OUTLINED ABOVE.

TROPHY MUST HAVE BEEN TAKEN DURING 2016 HUNTING SEASON.

*-May not be used for commercial purposes. For live animals, only valid if the transport conditions comply with the CITES Guidelines for Transport of Live Animals or, in the case of air transport, with IATA Live Animals Regulations.*

## 5a. Purpose of Transaction

H

## 6. U.S. Management Authority

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

*[Signature]*  
U.S. CITES  
Management Authority

09/30/2016

Issuing Date

United States Management Authority

AUTHORITY: Endangered Species Act of 1973 (16 USC 1531 et. seq.)

## 7/8. Common Name and Scientific name (genus and species) of Animal or Plant

## 9. Description of Part or Derivative, including identifying marks or numbers (age/sex if live)

## 10. Appendix No. and Source

## A. Common Name

LEOPARD

## Scientific Name

PANTHERA  
PARDUS

9. IMPORT PERSONAL SPORT HUNTED TROPHY  
(shipment may contain bones, claws, hide, skull, teeth, or any taxidermied part, as well as worked, manufactured, or handicraft items such as curios or jewelry, that must accompany raw or tanned parts.)

## 10. 1 W

## 11. Quantity (including units)

1

NO

12. Country of Origin  
ZIMBABWE

## B. Common Name

## Scientific Name

9. [Redacted]

## 10.

## 11. Quantity (including units)

## 12. Country of Origin

## C. Common Name

## Scientific Name

9. [Redacted]

## 10.

## 11. Quantity (including units)

## 12. Country of Origin

## D. Common Name

## Scientific Name

9. [Redacted]

## 10.

## 11. Quantity (including units)

## 12. Country of Origin

## E. Common Name

## Scientific Name

9. [Redacted]

## 10.

## 11. Quantity (including units)

## 12. Country of Origin



RCVD JUL 13 2017

(b) (6)

08-09

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5-A720  
86

7-17-17

DATE

Pay to the  
Order of

U.S. Fish Wildlife Service \$150.00  
One Hundred and 00/100

Comerica Bank

Comerica Bank  
www.comerica.com

Photo  
Safe  
Deposit  
Check or Cash

Armit-Leopold R. L. Leander

(b) (6)



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

OMB No 1018-0164  
Expires 11/30/2016

# Federal Fish and Wildlife Permit Application Form

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

Type of Activity:  
**Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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.

<b>A. Complete if applying as an individual</b>			
1 a. Last name <b>Tofte</b>	1 b. First name <b>David</b>	1 c. Middle name or initial	1 d. Suffix
(b) (6)		4 Affiliation/ Doing business as (see instructions)	
(b) (6)		b. Alternate telephone number (b) (6)	
<b>B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution</b>			
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
<b>C. All applicants complete address information</b>			
1 a. (b) (6) or Room #, no P O Boxes			
1 b. City <b>Williston</b>	1 c. State <b>ND</b>	1 d. (b) (6)	1 e. Country <b>USA</b>
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			
<b>D. All applicants MUST complete</b>			
1 Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))			
2 Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue _____ No <input checked="" type="checkbox"/>			
3 Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.			
Signature of applicant/person responsible for permit (No photocopied or stamped signatures) <i>David Tofte</i>		Date of signature (mm/dd/yyyy) <b>7/31/2017</b>	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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

- description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).  
~~skin, skull, claws, full mount~~  
 see attached picture n/a

3. IF THE ANIMAL IS DEAD, please enter the following:

a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: 523 48 206 4 E62 24 213

- 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 full mount

- splitting images  
14 Vitenhag Rd  
Port Elizabeth South Africa

- J.F. Schnickering  
P.O. Box 22929  
Windhoek, Namibia

- 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. I understand that I may only import two African elephant trophies in one 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.*

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).

Chicago

9. 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):

D+L CNB, LLC  
1500 Midway Court, Ste W201  
Elk Grove Village, IL 60007

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.

N/A

☐ 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):

Lisa Jamnik lisaj@dlchb.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.

**CUSTOMS POWER OF ATTORNEY**  
and  
**Acknowledgement of Terms and Conditions of Service**

Copyright 1995, National Customs Brokers and Forwarders Association of America, Inc.  
(Revised 07/04)

✓ appropriate box

- ☒ Individual  
☐ Partnership  
☐ Corporation  
☐ Sole Proprietorship  
☐ Limited Liability Company

SS# (b) (6)

KNOW ALL MEN BY THESE PRESENTS: That, ✓ DAVID (b) (6) TOFFE doing business as a ✓ INDIVIDUAL (Individual, partnership, corporation, sole proprietorship, or limited liability company) (Identify) under the laws of the State of ✓ North Dakota, residing or having a principal place of business at ✓ (b) (6), hereby constitutes and appoints ✓ D&L CHB, LLC (Grantor'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 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 ✓ DAVID (b) (6) TOFFE (Full name (b) (6)) caused these presents to be sealed and signed: (Signature) ✓ David Toffe  
(Capacity) ✓ N/A Date: ✓ 07/05/2017  
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.







CONVENTION ON  
INTERNATIONAL TRADE IN  
ENDANGERED SPECIES OF  
WILD FAUNA AND FLORA

PERMIT / CERTIFICATE No.

☒ EXPORT

0052153

☐ RE-EXPORT


Original

☐ IMPORT

☐ OTHER:

2. Valid until

27/08/2017

3. Importer (name and address) David (b) (6) Tofte Solitina Image Taxidermy The Haven Farm Grahamstown 8140, E-Cape Town		4. Exporter / Re-exporter (name, address and country) J. F. Schicklerling P. O. BOX 22828 Windhoek Namibia			
3a. Country of Import South Africa		6. Name, address, national seal/ stamp and country of Management Authority  MINISTRY OF ENVIRONMENT AND TOURISM Directorate: Scientific Services Private Bag 13306 Windhoek NAMIBIA			
5. Special conditions Export Permit # 144391 Import Permit # 171802		All imports and exports remain subject to veterinary regulations. 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 the transaction (see reverse) H	5b. Security stamp No. 1505200				
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. <i>Panthera pardus</i> Leopard		9. skull & skin NAPP 215/250 (2016)	10. I W	11. 2Item	11a. 15/250 (2016)
12. Country of origin *		12a. Country of last re-export	12b. No. of the operation ** or date of acquisition ***		
B 7.8.		9.	10.	11.	11a.
12. Country of origin *		12a. Country of last re-export	12b. No. of the operation ** or date of acquisition ***		
C 7.8.		9.	10.	11.	11a.
12. Country of origin *		12a. Country of last re-export	12b. No. of the operation ** or date of acquisition ***		
D 7.8.		9.	10.	11.	11a.
12. Country of origin *		12a. Country of last re-export	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 IS ISSUED BY J. Shapiro Windhoek 27/02/2017 Place Date					
14. EXPORT ENDORSEMENT 15. Bill of Lading / Air Waybill Number Block Quantity A 2 (Two) B = C = D = HAR 24/03/17 Port of Export / Re-export Date Hasea Kutale International Airport REPUBLIC OF NAMIBIA Official stamp and title Namprint: 2308					

Original

RCVD AUG 8 2017

D&L CHB, LLC  
1500 MIDWAY CT. W201  
ELK GROVE VILLAGE, IL 60007

BANK ONE  
CHICAGO, IL 60670  
2-1-710

DATE	CHECK NUMBER
------	-----------------

07/12/17

(b) (4)

PAY \*\*\*\*\*100DOLLARS&00CENTS

CHECK AMOUNT
--------------

\$100.00\*\*

PAY TO THE ORDER OF:

FISH & WILDLIFE

IL

(b) (4)







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 <b>SIMON</b>	1.b. First name <b>DAVID</b>	(b) (6)	1.d. Suffix
(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. Business address (Street address, Apt. #, P.O. #, Box #, P.O. Boxes)			
(b) (6)			
1.b. City <b>CASHIERS</b>	1.c. State <b>NC</b>	(b) (6)	1.f. Country <b>USA</b>
2.a. Mailing address (Street address, Apt. #, P.O. #, Box #, P.O. Boxes) (Include name of contact person if applicable)			
(b) (6)			
2.b. City <b>CASHIERS</b>	2.c. State <b>NC</b>	(b) (6)	2.f. Country <b>USA</b>

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.	
Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures)	Date of signature (mm/dd/yyyy) <b>08/01/2017</b>

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.

LEOPARD - PANTHERA PARDUS

b. Sex (if known).

NA

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 - WINDHOEK - AFRICA THIRSTLAND SAFARIS cc  
PO BOX 80087 WINDHOEK NAMIBIA 9000  
AFRICA

b. Date wildlife is to be hunted:

10/02/2017 — 10/17/2017

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, SHOULDER, LIFE SIZE

3. IF THE ANIMAL IS DEAD, please enter the following: NA

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: J. H. HONIBALL (KOBUS HONIBALL)  
Business Name: AFRICA THIRSTLAND SAFARIS CC  
Address: PO BOX 80087  
Address:  
City: WINDHOEK  
State/Province:  
Country, Postal Code: NAMIBIA AFRICA 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)

NA

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.


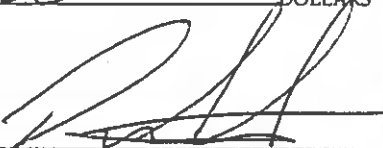
I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that 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: 08/01/2017

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

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).
9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):
10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.
- ☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.
11. Who should we contact if we have questions about the application? (Include name, phone number, and email):  
*DAVID SIMON* (b) (6)  
(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.

RCVD AUG 8 2017

		(b) (6)		64-10/610		(b) (6)	
				1000019354363			
				DATE <u>8-1-17</u>			
PAY TO THE ORDER OF		<u>U.S. Fish and Wildlife Service</u>				<u>\$100.00</u>	
<u>One hundred and 00/100</u>						DOLLARS	
		ACH RT 061000104				MP	
MEMO		<u>Appl Airport Permit</u>					
(b) (6)							





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 OF ARGALI

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 <b>Shives</b>	1 b. First name <b>Kenneth</b>	1 c. Middle name or initial <b>(b) (6)</b>	1 d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Social Security No. <b>(b) (6)</b>	4. Occupation <b>(b) (6)</b>	5. Affirmation/Doing business as (see instructions) <b>(b) (6)</b>

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. <b>(b) (6)</b> Room #, no P.O. Boxes					
1 b. City <b>Princeton</b>	1 c. State <b>NJ</b>	1 d. Zip code/Postal code <b>(b) (6)</b>	1 e. County/Province	1 f. Country <b>USA</b>	
2 a. Mailing Address (include if different than physical address, include name of contact person if applicable) <b>Same as above</b>					
2 b. City	2 c. State	2 d. Zip code/Postal code	2 e. County/Province	2 f. Country	

D. All applicants MUST complete	
1. Attach check or money order payable to the U S FISH AND WILDLIFE SERVICE in the amount of \$100 nonrefundable processing fee Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in Instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter P 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 understanding that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <b>(b) (6)</b> <b>08/25/2017</b> Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)	

## E. IMPORT OF SPORT-HUNTED TROPHIES OF ARGALI

- 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 were 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.** This form should be used only if you intend to hunt in Mongolia, the Kyrgyz Republic (Kyrgyzstan), and the Republic of Tajikistan (Tajikistan) that has annual quotas on the take of argali. Any permits issued will be conditioned that the permit is valid only if, at the port of entry, evidence from the conservation agency in the country of origin is presented showing that the trophy was part of that quota (e.g., copy of hunting license). If you are hunting in a different country, please use form 3-200-20 <http://www.fws.gov/international/permits/by-form-number/index.html>.
- Note 3.** Typically the Service receives more applications for permits than we are able to issue. In order to create the most equitable distribution system for issued permits, we have developed a specific procedure for accepting and ranking argali applications. Please see a discussion of this procedure on our website (<http://www.fws.gov/international/permits/by-form-number/index.html>).
- Note 4.** This permit will require a report on your hunt that must be submitted within 30 days of the import of your trophy. If you do not import a trophy you must return the unused permit. No further permits can be issued until this requirement is fulfilled.

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 submit, please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 2 through 6 for each trophy addressed in the application.

1. ENTER the quantity next to the name of Argali subspecies you are applying to import:

Argali (Marco Polo Sheep) ( <i>Ovis ammon poli</i> )	Quantity: <u>1</u>
Argali (Altai Sheep) ( <i>Ovis ammon ammon</i> )	Quantity: <u>      </u>
Argali (Gobi Sheep) ( <i>Ovis ammon darwini</i> )*	Quantity: <u>      </u>

\*Includes Hangai argali (the Service does not consider this to be a separate subspecies from *O. a. darwini*)

2. Date (MM/DD/YY) wildlife was (or is to be) taken: 11/2/2012

3. IF THE TROPHY IS ALREADY TAKEN,

a. Country and place (e.g., area, region, GIS coordinates, or hunting camp AND nearest city/town) where the argali was taken (provide a map if possible). Tajikistan, Lake Karakul Camp  
Pamir Region

b. A complete description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, horns). The permit will specifically identify all items being imported. This information must also match what appears on the export permit: shoulder mount

- c. The current location of the trophy (address and country):

Name: Kenneth Shives

Address: (b) (6)

City:

State/Pro

County, I

4. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD,**

- a. Country and place (e.g., area, region, GIS coordinates, or hunting camp, AND nearest city/town) where the argali is intended to be taken. Please be specific and provide a map, if available.

- b. A complete description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, horns). The permit will specifically identify all items being imported. This information must also match what appears on the export permit:

5. From which country do you intend to export/re-export the specimen, if different from the country of origin?

6. The U.S. Fish and Wildlife Service must make certain determinations under the U.S. Endangered Species Act before an import permit can be issued. If you have information (e.g., recent population surveys of argali in the area where you will hunt/have hunted; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation) that would support our findings, submit this information below or on a separate page with your application.

7. **CERTIFICATION STATEMENT** (original signature must be provided)

I acknowledge that the sport-hunted argali trophy(ies) 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 gain, or benefit**).

Applicant's signature: 

Date: 8/25/2017

*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 where possible, 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 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): *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): *Kenneth Shives* (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.

RCVD AUG 30 2017

(b) (6)

10-2/220

(b) (6)

DATE 8/28/2017

PAY TO THE ORDER OF U.S. Fish + Wildlife Service \$ 100 <sup>00</sup>  
One hundred and 00/100 DOLLARS

HSBC

Premier

MEMO Argali Import Application

(b) (6)





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

OMB No 1018-0164  
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

RCVD SEP 18 2017

LB

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

Type of Activity:  
**Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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 <b>KOEHL</b>	1.b. First name <b>JOSEPH</b>	1.c. Middle name/initial <b>(b) (6)</b>	1.d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Occupation <b>(b) (6)</b>		
4. Affiliation/ Doing business as (see instructions) <b>(b) (6)</b>			

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>(b) (6)</b>			
1.b. City <b>AUSTIN</b>	1.c. State <b>TX</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. Country <b>USA</b>
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. Country

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  <b>Joe Koehl</b> Signature of applicant/person responsible for permit (No photocopied or stamped signatures)	
<b>9/17/2017</b> Date of signature (mm/dd/yyyy)	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following: nearest city: Manyoni-Singida
- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: TANZANIA, SINGIDA REGION, RUNGWA WEST
- b. Date wildlife was hunted: AUGUST 19TH, 2017 GAME RESERVE WEST
- 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, LIFE SIZE MOUNT, 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 document]:

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 appear on the face of the export permit].

Name: Business MAPERA SAFARI LODGE & TOURS (T) LTD.

Name: Address:

Address: P.O. BOX 1525

City: ARUSHA

State/Province: TANZANIA

Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: \_\_\_\_\_

Date: 9/7/2017

*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 government to conduct your propose activity. While the Service will attempt to assist where possible, 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 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):

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):

JOE KOEHL  
(b) (6)

12. Disqualification. 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 NO.

2005989

CLIENT NAME

JOSEPH (b) (6) ROBEY

15219

COMPANY

MAFRO SAFARI LODGE AND TOURS (P) LTD

REGISTER OF GAME KILLED (INCLUDES WOUNDED ANIMALS)

PH NAME

MR. NATHAN ASREW, THABIT ALLY,

PH LICENSE NO.

SPECIES	No.	AREA WHERE HUNTED	WEAPON USED	DATE	TIME	SEX	GPS COORDINATES	LENGTH OF HORN/ANIMAL	OR WEIGHT	REMARKS
1 REDBUCK	ONE	MUHESI GRW	300	2/08/2017	12:00 PM	M	5.064.000.000.000	12.5" x 1.5"	12.5" x 1.5"	
2 HARTBEEST	ONE	MUHESI GRW	300	25/08/2017	05:00 PM	M	5.064.000.000.000	14.0" x 1.5"	14.0" x 1.5"	
3 ORIBI	ONE	MUHESI GRW	300	02/09/2017	03:02 PM	M	5.064.000.000.000	15.0" x 1.5"	15.0" x 1.5"	
4 ELAND	ONE	MUHESI GRW	300	11/09/2017	05:45 AM	M	5.064.000.000.000	20.0" x 1.5"	20.0" x 1.5"	
5 SABLE	ONE	MUHESI GRW	300	4/05/2017	14:30 PM	M	5.064.000.000.000	20.0" x 1.5"	20.0" x 1.5"	
6 IMPALA	ONE	RUNGWA GRW Rungwa	300	18/05/2017	10:40 AM	M	5.064.000.000.000	21.0" x 1.5"	21.0" x 1.5"	
7 LEOPARD	ONE	RUNGWA GRW Rungwa	300	19/05/2017	08:00 AM	M	5.064.000.000.000	8.0" x 1.5"	8.0" x 1.5"	
8 ZEBRA	ONE	RUNGWA GRW Rungwa	300	22/05/2017	12:15 PM	M	5.064.000.000.000	5.0" x 1.5"	5.0" x 1.5"	WOUNDED

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.

SIGNATURE OF THE HUNTING CLIENT

SIGNATURE OF THE PROFESSIONAL HUNTER

SIGNATURE OF WILDLIFE OFFICER INCHARGE



THE UNITED REPUBLIC OF TANZANIA  
MINISTRY OF NATURAL RESOURCES AND TOURISM

July 28, 2017 3:38:34 pm

MAIN PERMIT

IN.# 3059749

RETURN DATE: Tuesday, September 12, 2017

APP: 2005988

## GAME HUNTING PERMIT

PERMIT NO. 2005988

Station	ARUSHA	Start Date	August 02, 2017	End Date	August 22, 2017	Package Type	21 DAYS	Extra Days	0
This RESIDENT'S / VISITOR'S Permit is Granted to		JOSEPH (b) (6)		of Address		Pasaport No.		(b) (6)	
Who holds Weapon (Type)		31250		Calibre		375/300		Maker's No:	
Licence No:		00749/00109		Dated		23-08-2017		Issued At	
and entitles him to hunt the Below animals in the (Game area and blocks)		owned by		MARSA SAHARI LODGE AND TOURS (P) LTD		Weapon owner & Address		JOSEPH MORRIS	
PH MR. NATHAN ASKEW, THABITI ALDY,		PH CAT,		LICENSE No.					
Additional Blocks		RUNGWA RUNGWA GR.W							

SPECIES	No.	SAME SPECIES BOUGHT THIS YEAR
1. BUSHY YELLOW	2	
2. BOTTLED AFRICAN CAMEL	2	
3. CIVET AFRICAN	1	
4. DIBBLE KITE'S	1	
5. DUTCH COBBER	1	
6. SLAND LIVINGSTON	1	
7. HARTBEEST LICEPENTINIS	2	
8. NYAMA SPOTTED	1	
9. INFALA BOTTLED	1	
10. TACAL EIDE STRIPE	1	
11. RUDD CROAT	1	
12. LEOPARD	1	
13. GRILL COBBER	1	
14. RESOUND BOTTLED (COMMON)	1	
15. ROAN ANTELOPE	1	
16. KALIS ANTELOPE COBBER	1	
17. MARSH	1	
18. MATHIOCK DRAGON	1	
19. ZERA BUNCELE	2	

Signature of Licensee

Signature of Officer/ Officer Stamp

23 JUL 2017

1. This Hunting Permit must be surrendered to the Director of Wildlife Division within 30 days of expiry or immediately after the Permit holder 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 (except a Trophy dealer).
3. Maximum number of animals hunt will be accepted without the written authority of the Director of Wildlife.
4. A Hunter must obtain Certificate of Ownership for all trophies he/she acquires in a swap, transfer.
5. A Professional Hunter conducting a safari must carry his/her PH License during the entire safari.
6. A Professional Hunter conducting a safari must get a guide or better letter of authority from the Director of Wildlife to go out alone.
7. For weapons (including the license) PH or license of big game or shotgun or the type of birds or other animals to be hunted.
8. A Professional Hunter conducting a safari must take all measurements (height or weight) and record it in the data sheet provided immediately after the animal shot and as common.

15219

MINISTRY OF NATURAL RESOURCES AND TOURISM

MAIN PERMIT

IN.# 3059749

RETURN DATE:

Tuesday, September 12, 2017

APP: 2005988

## GAME HUNTING PERMIT

PERMIT NO.

2005989

Station	ARUSHA	Start Date	August 02, 2017	End Date	August 22, 2017	Package Type	21 DAYS	Extra Days:	0
This RESIDENT'S / VISITOR'S Permit is Granted to		JOSEPH (b) (6)		KOEHLI		of Address		Passport No. (b) (6)	
Who holds Weapon (Type)		RIFLES		Calibre		375/300		Maker's No: RF049127/ RL1013/ RR 034512/ RL1000	
Licence No: 007397/007397		Dated		23-10-2017		Issued At		Weapon owner & Address	
and entitles him to hunt the below animals in the (Game area and blocks)		owned by		MARERA SAFARI LODGE AND TOURS (T) LTD		PH		MR. NAZIM ASKEW, HASTY ALLEY,	
Additional Blocks		RUNGWA RUNGWA GR W.		PH CAT.		LICENSE No.			
						Signature of Holder		Signature of Issuing Officer & Official Stamp	
SPECIES		No.		SAME SPECIES BOUGHT THIS YEAR					
C. INFALE POOTREWA		2							

1. The Hunting Permit must be surrendered to the Director of Wildlife Division within 30 days of expiry or immediately the Professional Hunter is paid 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 or 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 License 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 removal rifle in the case of big game or shotgun 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 when an animal shot and its carcass.



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(b) (6)

(b) (6)

(b) (6)

Pay to the  
Order of

U.S. Fish and Wildlife Service

Date 7-8-17

One hundred and 00/100

\$ 100.00

BBVA COMPASS BANK  
AUSTIN, TX 78748

Dollars

Contains Security  
Features. Details  
on Back.

Rebekah Koehnly

For Permit processing fee

Pay to the

(b) (6)

Koehnly

(b) (6)

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

OMB No. 1018-0164  
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

RCVD SEP 18 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 of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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 <b>KOEHL</b>	1.b. First name <b>REBEKAH</b>	1.c. Middle name or initial <b>(b) (6)</b>	1.d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Occupation <b>(b) (6)</b>	4. Affiliation/ Doing business as (see instructions)	
5. Telephone number <b>(b) (6)</b>	6. Alternate telephone number <b>(b) (6)</b>	7. Fax number <b>(b) (6)</b>	8. E-mail address <b>(b) (6)</b>

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. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes) <b>(b) (6)</b>					
1.b. City <b>AUSTIN</b>	1.c. State <b>TEXAS</b>	1.d. Zip code/Postal code: <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>	
2.a. Mailing Address (include if different than physical address; include no box address)					
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country	

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter (b) (6) after 1 of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <b>Renee Koehl</b> Signature of applicant/person applying for permit (No photocopies or stamped signatures)
	<b>09/07/2017</b> Date of signature (mm/dd/yyyy)

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import is limited to two per hunter per calendar year)  
**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: **TANZANIA, SINGIDA REGION, MUHESI GR WEST AREA, SINGIDA NEAREST CITY**
- b. Date wildlife was hunted: **AUGUST 4, 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, LIFE SIZE MOUNT, 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 document]: **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 appear on the face of the export permit].

Name: Business **MARERA SAFARI LODGE & TOURS (T) LTD**  
Name: Address: **P.O. BOX 1525**  
Address:  
City: **ARUSHA, TANZANIA**  
State/Province:  
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: Rebekah Koethly

Date: 9-7-17

*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 proposed activity. While the Service will attempt to assist where possible, 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 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):

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 (b) (6) (one number, and email):

REBEKAH KOETHLY

(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.

PERMIT NO.

2005992

CLIENT NAME

REBEKAH (b) (6) KOEHLER

15223

COMPANY

MARERA SAFARI LODGE AND TOURS (P) LTD

REGISTER OF GAME KILLED (INCLUDES WOUNDED ANIMALS)

PH NAME

MR. CRISPIN MAYANDI &amp; MR. NATHAN ASKEW

PH LICENSE NO

LENGTH OF  
HORN/ANIMAL

SPECIES	No.	AREA WHERE HUNTED	WEAPON USED	DATE	TIME	SEX	GPS COORDINATES	OR WEIGHT	REMARKS
LEOPARD	01	MUHESI GR W	RIFLE	04/08/2017	17:30	M	S 02°10'12"E E 037°13'41"E		
SABLE	01	MUHESI GR W	RIFLE	08/08/17	17:40	M	S 02°10'01"E E 037°13'12"E		
IMPALA	01	RUNGWA RUNGWA W	RIFLE	17/08/2017	16:30	M	S 01°18'04"E E 037°10'17"E		
ELAND	01	RUNGWA RUNGWA W	RIFLE	19/08/2017	10:44	M	S 01°19'11"E E 037°10'28"E		
ORIBI	01	RUNGWA RUNGWA W	RIFLE	21/08/2017	12:03	M	S 01°10'01"E E 037°10'17"E		

SIGNATURE OF

HUNTING CLIENT

SIGNATURE OF THE PROFESSIONAL HUNTER

RUBA PAUL KAPAKAMA

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.

SIGNATURE OF

HUNTING CLIENT

SIGNATURE OF THE PROFESSIONAL HUNTER

RUBA PAUL KAPAKAMA

SIGNATURE OF WILDLIFE OFFICER INCHARGE



15223

MINISTRY OF NATURAL RESOURCES AND TOURISM

MAIN PERMIT

INR 3059756

RETURN DATE:

Tuesday, September 12, 2017

APP 2005992

## GAME HUNTING PERMIT

PERMIT NO.

2005993

Station	ARUSHA	Start Date	August 02, 2017	End Date	August 22, 2017	Package Type	21 DAYS	Extra Days	0
This RESIDENT'S / VISITOR'S Permit is Granted to		REBEKAH (b) (6) KOENLY		of Address		NO MATCH	Passport No. (b) (6)		
Who holds Weapon (Type)		RIFLE		Calibre		375	Maker's No.		3141
Licence No.		007573		Dated		03-Jul-2017	Issued At		MUHESI GR W
and entitles him to hunt the below animals in the (Game area and blocks)		owned by		MARERA SAFARI LODGE AND TOURS (T) LTD		Weapon owner & Address		REBEKAH (b) (6) KOENLY	
PH NO		CHRISTIN MALINDISA, KRISTIAN		PH CAT.		LICENSE No.			
Additional Blocks		RUNGWA RUNGWA GR W							

SPECIES	No.	SAME SPECIES BOUGHT THIS YEAR
1. BARBON YELLOW	2	
2. BUFFALO AFRICAN CAMEL	2	
3. BUSHBOKK HART	1	
4. CLEVEY AFRICAN	1	
5. DIBBIE KIM'S	1	
6. DUTELA COMMON	1	
7. ELAND LIVINGSTON	2	
8. HARTBEESE LICHTEINSTEIN'S	1	
9. KAPPA SPOTTED	1	
10. KUDU SPOTTED	1	
11. JACKAL SIDE STRIPED	2	
12. KUDU GREATER	2	
13. LEOPARD	1	
14. LION	1	
15. ORISKI COMMON	1	
16. OSTRICH	1	
17. RHINOCEROS COMMON	1	
18. SCAR ANTELOPE	1	
19. TATE ANTELOPE COMMON	1	
20. HARTBEE	1	
21. ZEBRA BROWN	2	


  
 Signature of Rebekeah Koely


  
 Signature of Christin Malindisa


  
 28 JUL 2017

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 or 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 will keep or transfer.
5. A Professional Hunter conducting a safari must carry his/her Ph 1 license during the safari.
6. A Professional Hunter conducting a safari must get a guide to obtain letter of authority from the Director of Wildlife to go out alone.
7. For weapons indicate the number, rifle or the size of big game or shotgun in the case of birds of course in the case of fish.
8. A Professional Hunter conducting a safari must take all measurements and record them in the data sheet provided immediately after the safari and to be signed.

ORIGINAL

15223

## THE UNITED REPUBLIC OF TANZANIA

MINISTRY OF NATURAL RESOURCES AND TOURISM

July 01/2017 9:37:54 am

IN.# 8059756

APP: 2005992



## GAME HUNTING PERMIT

RETURN DATE:

Tuesday, September 12, 2017

PERMIT NO.

2005993

Station	ARUSHA	Start Date	August 02, 2017	End Date	August 22, 2017	Package Type	31 DAYS	Extra Days	0															
This RESIDENT'S / VISITOR'S Permit is Granted to		REBEKAH (b) (6)		KOEHLI		of Address		Passport No. (b) (6)																
Who holds Weapon (Type)		RIFLE		Calibre		115		Maker's No. 01781																
Licence No: 007178		Dated 03-JUL-2017		Issued At		Weapon owner & Address		REBEKAH (b) (6) KOEHLI																
and entitles him to hunt the below animals in the (Game area and blocks) owned by: MARERA SAFARI LODGE AND TOURS (T) LTD																								
PH: MR. CRISPIN MAYANDIKA, MR. NATEAN		PH CAT.		LICENSE No.																				
Additional Blocks		RUNGWA RUNGWA GR.W																						
Signature of Hunter					Signature of Issuing Officer & Official Stamp																			
<table border="1"> <thead> <tr> <th>SPECIES</th> <th>No.</th> <th>SAME SPECIES BOUGHT THIS YEAR</th> </tr> </thead> <tbody> <tr> <td>1. IMPALA BOWEN</td> <td>1</td> <td></td> </tr> <tr> <td>2. PORCUPINE CRESTED</td> <td>1</td> <td></td> </tr> <tr> <td>3. KAYEL (BOWEN BARKER)</td> <td>1</td> <td></td> </tr> <tr> <td>4. STAMBECK</td> <td>1</td> <td></td> </tr> </tbody> </table>										SPECIES	No.	SAME SPECIES BOUGHT THIS YEAR	1. IMPALA BOWEN	1		2. PORCUPINE CRESTED	1		3. KAYEL (BOWEN BARKER)	1		4. STAMBECK	1	
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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.
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7. For weapons indicate the borement size in the case of big game or shotgun 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 is shot and its carcass.



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(b) (6)

Date 7-8-17

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

One hundred and 00/100 Dollars

BBVA COMPASS BANK  
AUSTIN, TX 78746

Joseph Koehly Diana Koehly

(b) (6)

PRINTED ON RECYCLED PAPER USING VEGETABLE BASED INK



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

RCVD SEP 20 2017

OMB No. 1018-0164  
Expires 11/30/2016

**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 of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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.

<b>A. Complete if applying as an individual</b>			
1 a. Last name <b>HAGGETT</b>	1 b. First name <b>CATHERINE</b>	1 c. Middle name or initial <b>(b) (6)</b>	1 d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Occupation		
4. Affiliation/ Doing business as (see instructions)			
5 a. Telephone number <b>(b) (6)</b>	5 b. Alternate telephone number	5 c. Fax number	5 d. E-mail address <b>(b) (6)</b>

<b>B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution</b>			
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

<b>C. All applicants complete address information</b>					
1 a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) <b>(b) (6)</b>					
1 b. City <b>ARLINGTON</b>	1 c. State <b>VA</b>	1 d. Zip code/Postal code <b>(b) (6)</b>	1 e. County/Province <b>(b) (6)</b>	1 f. Country <b>USA</b>	
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	

<b>D. All applicants MUST complete</b>	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: <b>LE92488A-0</b> No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in <i>Title 50, Part 13 of the Code of Federal Regulations</i> and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and understanding that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <b>(b) (6)</b> <i>Catherine Haggett</i> Signature of applicant/person responsible for permit (No photocopied or stamped signatures)	
<b>09/18/2017</b> Date of signature (mm/dd/yyyy)	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: 0 (Import is limited to two per hunter per calendar year)  
**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: 0 (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: **FARM ONGOMBEANAVITA, OKAHANDJA DISTRICT, OKAHANDJA, NAMIBIA**  
**GIS COORDINATES: E 16° 32' 36" S 21° 33' 50"**
- b. Date wildlife was hunted: Hunt permitted for Aug 11 - Aug 25, 2017. Animal harvested on Aug 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):

Leopard skull, full mount skin, 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 document]:

Ingwe Wildlife Art, Industrial Street - West, 786 Okahandja, Namibia

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 appear on the face of the export permit].

Name: Business	PH: Hugo Koetzé
Name: Address:	ADDRESS: Wilhelms Court, Okahandja, Namibia, 9000
Address:	SHIPPER: International Air Cargo Services
City:	PHYSICAL ADDRESS: 10 Newcastle Street Industrial Park, Windhoek, Namibia
State/Province:	MAILING ADDRESS: P.O. Box 81089, Olympia, Windhoek, Namibia
Country, Postal Code:	Windhoek Khomas Region Namibia

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported (b) (6) United States, cannot be re-exported.

Applicant's signature: \_\_\_\_\_

Date: 09/18/2017

*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 government to conduct your propose activity. While the Service will attempt to assist where possible, 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 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):

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):

Catherine (b) (6) Haggett, (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.



RCVD SEP 20 2017



(b) (6)

(b) (6)

Sept 18, 2017

Pay to the  
Order of

U.S. Fish + Wildlife Service

\$ 100

One hundred and 00/100

Dollars



BB&T

BRANCH BANKING AND TRUST COMPANY  
1-800-BANK BBT BBT.com

BB&T@WORK

(b) (6)

Permit Application - Southern African  
Leopard

(b) (6)

Cathie [Signature]



RCVD NOV 07 2017

October 31, 2017

US Fish and Wildlife

To whom it may concern:

My name is Darrell (b) (6) Vincent and I am applying for a CITIES permit to import a leopard that my minor son shot in 2016. His name is Nicolas (b) (6) Vincent.

I am attaching copies of both our passport information and pictures. We are importing the leopard under my name, Darrell (b) (6) Vincent.

I appreciate your time and attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink that appears to read 'Darrell Vincent'.

Darrell (b) (6) Vincent

(b) (6) Firebaugh, CA (b) (6) • (b) (6)  
*Almonds • Cotton • Hay • Wheat • Pistachios*



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

OMB No. 1018-0164  
Expires 11/30/2016

RCVD NOV 07 2017

23

**Federal Fish and Wildlife Permit Application Form**

RCVD NOV 07 2017

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

**Type of Activity:**  
**Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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 <u>Vinecent</u>	1.b. First name <u>Darrell</u>	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Occupation	4. Affiliation/Doing business as (see instr)	
5.a. Telephone number <u>541</u>	5.b. Alternate telephone number	5.c. Fax number	5.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		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 <u>Firebaugh</u>	1.c. State <u>Calif</u>	1.e. (b) (6)	1.f. Country <u>USA</u>
2.a. M (b) (6) physical address; include name			
2.b. City <u>Firebaugh</u>	2.c. State <u>Calif</u>	2.d. (b) (6)	2.f. Country <u>USA</u>

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <u>Darrell Vinecent</u> Signature of applicant/person responsible for permit (No photocopied or stamped signatures) <u>10/31/2017</u> Date of signature (mm/dd/yyyy)	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: OZONDUNDA Conservancy (Property Name)  
Thornhill & Cochran Safaris (Outfitter) Klein Windhoek Namibia  
b. Date wildlife was hunted: July 13, 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, skull, Jaw, 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 document]:

Brink Grobler (PH) location Yellow Shark Holdings Pty Ltd  
P.O. Box 90911 Windmill Park Unit 7 Dante Street  
Klein Windhoek Namibia Prosperita, Windhoek - Namibia

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 appear on the face of the export permit].

Name: Business The yellow Shark holdings (PTY) Ltd  
Name: Address: Windmill Park unit 7 Dante street  
Address: P.O. Box 81413  
City: Windhoek  
State/Province: Namibia  
Country, Postal Code: None

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: Darrell Vincent (Father) for Date: 10/5/2017  
Nicolas Vincent

*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.*

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).

San Francisco

9. 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):

Coppersmith Inc 434 Rozzi Place  
South San Francisco, Calif 94080

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 (b) (6) contact if we have questions about the application? (Include name, phone number, and email):

Darrell Vincent

(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.

*Of the United States  
in Order to form a more perfect Union,  
establish Justice, insure domestic Tranquility,  
provide for the common defence  
promote the general Welfare and secure  
the Blessings of Liberty to ourselves and  
our Posterity, do ordain and establish this  
Constitution for the United States of America.*

SIGNATURE OF BEARER / SIGNATURE DU TITULAIRE / FIRMA DEL TITULAR

PASSPORT  
PASSEPORT  
PASAPORTE

UNITED STATES OF AMERICA

(b) (6)

Sartorius / No. 109-07-07

VINCENT

**STUDY NOTES /** **Principles & Notes**

DEARRELL (b) (6)

8. Nationality / National / Nationality

UNITED STATES OF AMERICA

Date of birth / Data de nascimento / Fecha de nacimiento  
(b) (6)

(b) (6)

7-11-2001 11:11:11 AM

CALIFORNIA, U.S.A.

Date of issue / Date of delivery / Date of receipt

10 Apr 2019

Date of completion / Date of expiration / Expiration date

09 Apr 2024

SEE PAGE 55

SEE PAGE 51

(b) (6)

DARRELL (b) (6) <<<

\_\_\_\_\_

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\_\_\_\_\_

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2204

and that is how a man grows. Every  
man has faith in his own strength. Daughters  
conquer for the winning nations.  
I hope we spread the light and inspire  
the burning of a flame in ourselves and  
our country, to sustain and enlighten the  
Excelsior for the 21st century of America.



SIGNATURE OF BEARER / SIGNATURE DU TITULAIRE / FIRMA DEL TITULAR

Type / Type / Tipo: [redacted] / [redacted] / [redacted]  
 Country / País / Pais: USA

Surname: McDonald

VINCENT

### Give Names

DARRELL

Nationality / M

UNITED STATES OF AMERICA

Date of birth / Date de naissance / Fecha de nacimiento  
(b) (6)

(b) (6)

Edad / Lugar de nacimiento

CALIFORNIA, U.S.A.

Date of issue / Date de délivrance / Fecha de expedición

~~02 JUL 2007~~

Date of expiration (Date d'expiration) / Formule de validité (Date d'expiration)

01 JUL 2017

Endorsements / Mentions Spéciales / Agradaciones

**SEE PAGE 27**

P<USAVINC<<DARRELL<(b) (6)

(b) (6)

Old Passport



# We the People

*Of the United States,  
in Order to form a more perfect Union,  
establish Justice, insure domestic Tranquility,  
provide for the common defence,  
promote the general Welfare, and secure  
the Blessings of Liberty to ourselves and  
our Posterity, do ordain and establish this  
Constitution for the United States of America.*



Nicolas Vincent

SIGNATURE OF BEARER / SIGNATURE DU TITULAIRE / FIRMA DEL TITULAR

PASSPORT  
PASSEPORT  
PASAPORTE

UNITED STATES OF AMERICA

VINCENT

NICOLAS

UNITED STATES OF AMERICA

07-Jan-2015

06-Jan-2020

SEE PAGE 27

USA

(b) (6)

(b) (6)

(b) (6)

(b) (6)

(b) (6)

(b) (6)

CASH ONLY IF ALL CheckLock<sup>SM</sup> SECURITY FEATURES LISTED ON BACK INDICATE NO TAMPERING OR COPYING

(b) (6) (b) (6) (b) (6)

11/1/2017

PAY TO THE ORDER OF US FISH AND WILDLIFE \$ \*\*100.00

One Hundred and 00/100\*\*\*\*\* DOLLARS

US FISH AND WILDLIFE (A PROTECTED AGAINST FRAUD)

CITIES PERMIT/LEOPARD

(b) (6)

*[Signature]*





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

RECEIVED NOV 22 2017 LB

Return to: Division of Management Authority (DMA)  
U.S. Fish and Wildlife Service  
4401 N. Fairfax Drive, Room 212  
Arlington, VA 22203  
1-800-358-2104 or 703-358-2104

Type of Activity:  
Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros

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 <b>Montgomery</b>	1.b. First name <b>James</b>	1.c. Middle name/initial <b>(b) (6)</b>	1.d. Suffix
2. (b) (6)			
3. (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. P (b) (6)					
1.b. City <b>Columbia</b>	1.c. State <b>KY</b>	1.d. (b) (6)		1.f. Country <b>USA</b>	
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)					
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country	

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: <b>154851523B/9</b> No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <b>James Montgomery</b> Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) <b>11-21-2017</b> Date of signature (mm/dd/yyyy)	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**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 were 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:** The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: N/A (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: N/A (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

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, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: Bulawayo, Zimbabwe Concession/Farm: Sijarira
- b. Date wildlife was hunted: Grid Ref. 101-778  
September 18, 2017 through September 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):

One - Leopard skin - pre-tanned  
one - Leopard skull - Bleached

- 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]:

Matabeleland Taxidermist  
16 Birmingham 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 appear on the face of the export permit].

Name: Freight Consultants  
Business Name: 3 Trojan Street  
Address: Bulawayo, Zimbabwe  
Address:  
City:  
State/Province:  
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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: \_\_\_\_\_

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: James (b) (6) Montgomery Date: 11-21-2017

*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 government to conduct your propose activity. While the Service will attempt to assist where possible, 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).

Chicago, Illinois

9. 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 specify an alternative means below):

James (b) (6) Montgomery  
(b) (6)  
Columbia, Kentucky (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):

James (b) (6) Montgomery (b) (6)  
(b) (6) (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.



(b) (6)

2-93

73-269/421

(b) (6)

DATE

11-22-2017

MP

6 DOLLARS please detach at  
bottom of document for security



PAY TO  
THE ORDER OF

U.S. Fish and Wildlife Service

\$

100 <sup>no</sup>/<sub>100</sub>

One Hundred & no/100

DOLLARS

Heat  
Reactive  
Ink



**Community  
Trust Bank**  
Columbia Office • Columbia, Kentucky

**THE  
CLUB**

MEMO

processing fee

Kenneth Montgomery

MP

(b) (6)

DETAILS ON BACK.





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: 1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

**Type of Activity:**  
**Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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 <b>Gappa</b>	1 b. First name <b>Doug</b>	1 c. Middle name or initial	1 d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	4. Occupation	5. Affiliation/ Doing business as (see instructions)	
6 a. Telephone number <b>(b) (6)</b>	6 c. Fax number <b>847-690-0690</b>	6 d. E-mail address <b>lisa@dlchb.com</b>	

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. <b>(b) (4)</b> Boxes)			
1 b. City <b>Madelia</b>	1 c. State <b>MN</b>	1 d. Zip code/Postal code <b>(b) (6)</b>	1 e. County/Province
2 a. Mailing Address (include if different than physical address, include name of contact person if applicable)			1 f. Country <b>USA</b>
2 b. City	2 c. State	2 d. Zip code/Postal code	2 e. County/Province
			2 f. Country

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <b>Lisa Samant</b> Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) <b>11/28/2017</b> Date of signature (mm/dd/yyyy)	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**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 were 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:** The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: \_\_\_\_\_ (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

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, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:

a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: Namibia, Omuwiwe #32, Omuwiwe lodge  
Ojiwarango

b. Date wildlife was hunted:

9/19/2017

- 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 full 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 document]:

Trophäendienst Taxidermy  
P.O. Box 21068  
Plot 65/16  
Windhoek, Namibia

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 appear on the face of the export permit].

Name:

Business Name:

Address:

Address:

City:

State/Province:

Country, Postal Code:

D.J. Jacobs  
P.O. Box 125  
Otjiwarongo, Namibia

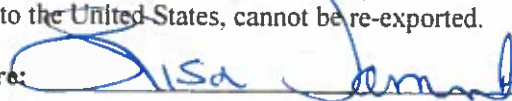
5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion 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:

11/28/2017

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 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.*

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).

Chicago

9. 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):

D&L CHB LLC  
1500 Midway Crt, Ste W201  
Elk Grove Village, IL 60007

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):

Lisa Jamnik 847-690-0690 lisaj@dichb.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.

H6605

**CUSTOMS POWER OF ATTORNEY**  
and  
**Acknowledgement of Terms and Conditions of Service**

Copyright 1995, National Customs Brokers and Forwarders Association of America, Inc.  
(Revised 07/04)

✓ appropriate box:

- ☒ Individual  
☐ Partnership  
☐ Corporation  
☐ Sole Proprietorship  
☐ Limited Liability Company

SS#

(b) (6)

KNOW ALL MEN BY THESE PRESENTS: That, ✓ Douglas Gappa doing  
(Full name of individual, partnership, corporation, sole proprietorship, or limited liability company) (Identify)  
business as a ✓ INDIVIDUAL  
(Individual, partnership, corporation, sole proprietorship, or limited liability company) (Identify)  
under the laws of the State of ✓ Minnesota,  
residing or having a principal place of business at ✓ (b) (6) Madelia Mn (b) (6),  
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 Terms and Conditions of Service governing all transactions between the Parties.  
(Grantee's Name)

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 ✓ Douglas Gappa  
(Full name of company)

caused these presents to be sealed and signed: (Signature) ✓ Douglas Gappa

(Capacity) ✓ N/A Date: July 14, 2014

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.



RCVD NOV 29 2017

D&L CHB, LLC  
1500 MIDWAY CT, W201  
ELK GROVE VILLAGE, IL 60007

BANK ONE  
CHICAGO IL 60670  
2-1710

DATE	CHECK NUMBER
11/28/17	(b) (4)

PAY \*\*\*\*\*100DOLLARS&00CENTIS

CHECK AMOUNT

PAY TO THE ORDER OF:

\$100.00

FISH & WILDLIFE

IL



(b) (4)



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 DEC 15 2016

LB

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 Ryan	1.b. First name Jimmie	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions)
6.a. Telephone number (b) (6)	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address matt@genuslogistics.com

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 Alabaster	1.c. State AL	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)			1.f. Country US
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 <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 15US71502B9 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) 12/14/16 Date of signature (mm/dd/yyyy)	

**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 15US71502B9.
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: \_\_\_\_\_

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):

Genus Logistics 161-15 Rockaway Blvd Jamaica NY 11434 SASE included FedEx

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):

Matt Mayers Genus Logistics 718 790 0216 matt@genuslogistics.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.





# CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

## IMPORT PERMIT

Page 1 of 1

1. Original Permit/Certificate No.  
**15US71502B/9**
2. Valid  
**12/10/2016**

## 3. Permittee (name and address, country)

JIMMI (b) RYAN

(b) (6) (6)  
ALABASTER, AL (b)  
U.S.A. (6)

## 4. Consignee (name and address, country)

KWALATA SAFARIS  
PLOT NO. 8980  
HEAVY INDUSTRIAL AREA, KATANGA ROAD  
LUSAKA  
ZAMBIA

Original, Unused  
Permit Returned

## 5. Special Conditions

MUST COMPLY WITH ATTACHED GENERAL PERMIT CONDITIONS.

SPECIMEN MAY NOT BE SOLD OR TRANSFERRED FOR ANY FINANCIAL REMUNERATION.

MUST IMPORT THROUGH A DESIGNATED PORT LISTED IN CONDITION 10

U.S. THREATENED SPECIES: TUSKS MUST BE MARKED AS PER [50 CFR 17.40(e)]. IN  
ACCORDANCE WITH THE AFRICAN ELEPHANT CONSERVATION ACT, RAW IVORY,  
INCLUDING SPORT-HUNTED TROPHIES THAT ARE WHOLLY OR PARTIALLY IVORY, MAY NOT  
BE RE-EXPORTED FROM THE U.S.

TROPHY MUST HAVE BEEN TAKEN DURING 2011 HUNTING SEASON

-May not be used for commercial purposes. For live animals, only valid  
if the transport conditions comply with the CITES Guidelines for  
Transport of Live Animals or, in the case of air transport, with IATA Live  
Animals Regulations.

## 5a. Purpose of Transaction

H

## 6. U.S. Management Authority

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

U.S. CITES  
Management Authority

12/11/2015

Issuing Date

United States Management Authority

AUTHORITY: Endangered Species Act of 1973 (16 USC 1531 et. seq.)

## 7/8. Common Name and Scientific name (genus and species) of Animal or Plant

## 9. Description of Part or Derivative, including identifying marks or numbers (age/sex if live)

## 10. Appendix No. and Source

A. Common Name  
AFRICAN  
ELEPHANT

Scientific Name  
LOXODONTA  
AFRICANA

9. IMPORT PERSONAL SPORT HUNTED TROPHY  
(shipment may contain bones, hair, hide, tusks, teeth, or  
any taxidermied part, as well as worked, manufactured, or  
handicraft items such as curios, jewelry, or other utilitarian  
items.)

10. 1 W  
11. Quantity (including units)  
1 NO  
12. Country of Origin  
ZAMBIA

B. Common Name

Scientific Name

9. [REDACTED]

10. [REDACTED]  
11. Quantity (including units)  
[REDACTED]  
12. Country of Origin  
[REDACTED]

C. Common Name

Scientific Name

9. [REDACTED]

10. [REDACTED]  
11. Quantity (including units)  
[REDACTED]  
12. Country of Origin  
[REDACTED]

D. Common Name

Scientific Name

9. [REDACTED]

10. [REDACTED]  
11. Quantity (including units)  
[REDACTED]  
12. Country of Origin  
[REDACTED]

E. Common Name

Scientific Name

9. [REDACTED]

10. [REDACTED]  
11. Quantity (including units)  
[REDACTED]  
12. Country of Origin  
[REDACTED]

547843



# 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, 1993.

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 #

(b) (6)

## CUSTOMS POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS, that JIMMIE

(b) (6)

RYAN

(Full Name)

Residing at, ALABASTRY AL.

(b) (6)

hereby constitutes and appoints each of the following persons Matthew Mayers dba Genus Logistics

may act through any of its offices 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 consigned 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 grantor's name drawn on the Treasurer of the United States, if the grantor is a non-resident 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 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 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 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 111.35(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): JIMMIE

(b) (6)

RYAN

has caused these presents to be sealed and signed: (Signature): [Signature]

(b) (6)

Date: 9-02-15

WITNESS: [Signature]

Date: 9-02-15



PASSPORT  
PASSEPORT  
PASAPORTE

UNITED STATES OF AMERICA

104 1201 T  
P USA

RYAN

JIMMIE

UNITED STATES OF AMERICA

צ. ס. שוחט

19-Nov-2008

18 Nov 2018

SEE PAGE 51

United States  
Department of State

USA

P<USARYAN<<JIMM

<<<<<<<<<<<<<<<<<<<

RCVD DEC 15 2016

Genus Logistics  
718-790-0216

PAY  
TO THE  
ORDER OF

USFW

One hundred

DATE

12/14/16

12/210

\$ 100.00

DOLLARS

CHASE

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

OR

EXPORT PERMIT TIMMS 1/14/16/6455 pld

(b) (4)

(b) (4)





**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 17US71502B9.
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: 2/15/18

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):

GENUS LOGISITCS  
161-15 ROCKAWAY BLVD  
JAMIACA, N.Y 11434

SUITE 205

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):

MATT MAYERS

7187900216

MATT@GENUSLOGISTICS.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.





# CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

## IMPORT PERMIT

Page 1 of 1

1. Original Permit/Certificate No.  
17US71502B/92. Valid  
01/05/2018

## 3. Permittee (name and address, country)

JIMMIE (b) RYAN

(b) (6) (b) (6)

ALABASTER, AL (b)

U.S.A. (b)

Original, Unused  
Permit Returned

## 4. Consignor (name and address, country)

KWALATA SAFARIS

PLOT NO. 6980

HEAVY INDUSTRIAL AREA, KATANGA ROAD

LUSAKA

ZAMBIA

## 5. Special Conditions

MUST COMPLY WITH ATTACHED GENERAL PERMIT CONDITIONS

SPECIMEN MAY NOT BE SOLD OR TRANSFERRED FOR ANY FINANCIAL REMUNERATION

MUST IMPORT THROUGH A DESIGNATED PORT LISTED IN CONDITION 10.

U.S. THREATENED SPECIES: TUSKS MUST BE MARKED AS PER [50 CFR 17.40(e)]. IN ACCORDANCE WITH THE AFRICAN ELEPHANT CONSERVATION ACT, RAW IVORY, INCLUDING SPORT-HUNTED TROPHIES THAT ARE WHOLLY OR PARTIALLY IVORY, MAY NOT BE RE-EXPORTED FROM THE U.S.

TROPHY MUST HAVE BEEN TAKEN DURING 2011 HUNTING SEASON

THIS RE-ISSUES AND REPLACES 17US71502B/9 ISSUED 12/11/2015.

-May not be used for commercial purposes. For live animals, only valid if the transport conditions comply with the CITES Guidelines for Transport of Live Animals or, in the case of air transport, with IATA Live Animals Regulations.

## 5a. Purpose of Transaction

H

## 6. U.S. Management Authority

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

U.S. CITES  
Management Authority

01/06/2017

Issuing Date

United States Management Authority

AUTHORITY: Endangered Species Act of 1973 (16 USC 1531 et. seq.)

## 7/B. Common Name and Scientific name (genus and species) of Animal or Plant

A. Common Name  
AFRICAN  
ELEPHANTScientific Name  
LOXODONTA  
AFRICANA

## 9. Description of Part or Derivative, Including Identifying marks or numbers (age/sex if live)

9. IMPORT PERSONAL SPORT HUNTED TROPHY (shipment may contain bones, hair, hide, tusks, teeth, or any taxidermied part, as well as worked, manufactured, or handicraft items such as curios, jewelry, or other utilitarian items.)

## 10. Appendix No. and Source

10. 1 W

11. Quantity (including units)

1

NO

12. Country of Origin  
ZAMBIA

## B. Common Name

Scientific Name

## 9.

## 10.

11. Quantity (including units)

12. Country of Origin

## C. Common Name

Scientific Name

## 9.

## 10.

11. Quantity (including units)

12. Country of Origin

## D. Common Name

Scientific Name

## 9.

## 10.

11. Quantity (including units)

12. Country of Origin

## E. Common Name

Scientific Name

## 9.

## 10.

11. Quantity (including units)

12. Country of Origin

606447



# 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 (b) (6)  
U.S. Customs (b) (6)  
141 (b) (6)

Social Security # (b) (6)

## CUSTOMS POWER OF ATTORNEY

ALLIANCE BY THESE PRESENTS: That, JIMMIE (b) (6) RYAN

Residing at, (b) (6)

ALABASTAR FL. (b) (6)

(Full Name)

hereby constitutes and appoints each of the following persons Matthew Mayers dba Genus Logistics

may act through any of its offices 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 consigned 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 proper entry, 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 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 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 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 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 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 111.36(a), election is made waiving the right to receive invoices, supporting documents and correspondences 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): JIMMIE (b) (6) RYAN

has caused these presents to be sealed and signed: (Signature): [Signature] Date: 9-02-85

WITNESS: Jean K. Pearson

Date: 9-02-85





## NOTICE TO THE WILDLIFE IMPORT/EXPORT COMMUNITY



October 16, 2017

Subject: Electronic Licensing

**Background:** Anyone engaging in business as an importer or exporter of wildlife must obtain a USFWS import/export license. In the past, importers and exporters could only apply for an import/export license from the Service by completing a paper form and presenting it to a Service wildlife inspection office or an Office of Law Enforcement Permits Office.

The Fish and Wildlife Service has developed and tested a new voluntary electronic licensing system (eLicense). eLicense allows users to apply for a new import/export license or renew or amend a current or expired license from the Service via a secured Internet web site. The system facilitates clearance of wildlife imports and exports, allowing users to store data for future use and communicate by e-mail with Service license issuers.

**Action:** Effective October 2, 2017, the new eLicense system will be available for use by any individual or company that imports or exports wildlife for commercial purposes. Although the Service will continue to accept and process traditional "paper" applications for those who prefer that method of applying, we encourage importers and exporters to take advantage of the new electronic application system.

Importers and exporters may access eLicense via the Office of Law Enforcement eLicense home page (<https://www.fws.gov/elicense>).

To complete an application with eLicense, users need Internet connectivity, an e-mail address, the Microsoft Internet Explorer browser (version 5.0 or higher), and an ink jet or laser printer. No special software is required, and no additional fees are charged for using eLicense. Help files on the eLicense web site provide an on-line user manual, information on reconfiguring your Internet browser, filing instructions, and useful FAQs.

There is no reason for you to have a USFWS import/export license if you do not commercially import or export wildlife. Requests for license renewals will be reviewed for import/export activity.

This document does not convey any rights, benefits, or privileges beyond authorizing you to engage in business as an importer or exporter of wildlife. The import/export license is not recognized outside the United States.

**Contact:**

U.S. Fish and Wildlife Service  
Office of Law Enforcement  
703-358-1949; 703-358-2271 (fax)  
[lawenforcement@fws.gov](mailto:lawenforcement@fws.gov) (e-mail)

RCVD MAR 6 2018

THIS DOCUMENT HAS A COLORED BACKGROUND AND MICROPRINTING. THE REVERSE SIDE INCLUDES AN ARTIFICIAL WATERMARK.

Genus Logistics Inc.  
181 15 Rockaway Blvd Suite 205  
Jamaica NY 11434  
Tel. 718-790-0216

Chase  
JP Morgan Chase Bank, N.A.  
www.chase.com

(b) (4)

DATE 02/15/18

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 **RYAN RENEWAL FEE 11300**



(b) (4)



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 MAR 05 2018

LB

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

Type of Activity:

**IMPORT OF SPORT-HUNTED BONTEBOK TROPHIES FROM SOUTH AFRICA**

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 <u>Wilson</u>	1.b. First name <u>Jamer</u>	1.c. Middle name or initial <u>(b) (6)</u>	1.d. Suffix
2. Date of birth (mm/dd/yyyy) <u>(b) (6)</u>	3. Social Security No. <u>(b) (6)</u>	4. Occupation <u>(b) (6)</u>	
5. Affiliation/ Doing business as (see instructions)			
6.a. Telephone number <u>(b) (6)</u>	6.b. Alternate telephone number <u>(b) (6)</u>	6.c. Fax number <u>(b) (6)</u>	6.d. E-mail address <u>(b) (6)</u>

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) <u>(b) (6)</u>				
1.b. City <u>Meridian</u>	1.c. State <u>Id</u>	1.d. Zip code/Postal code: <u>(b) (6)</u>	1.e. County/Province <u>(b) (6)</u>	1.f. Country <u>USA</u>
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter 1 of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <u>Jamer (b) (6) Wilson</u> Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) <u>02-22-2018</u>

## E. IMPORT OF SPORT-HUNTED BONTEBOK TROPHIES from South Africa

**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 were 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:** The bontebok is listed as endangered under the Endangered Species Act. Applications for endangered species permits must be published in the Federal Register for a 30-day public comment period. Allow at least **90 days** for the application to be processed.

**Note 3:** This application can only be used if you have hunted/will be hunting in **South Africa**. If you have or will be hunting in a different country, please use form 3-200-20: <http://www.fws.gov/international/permits/by-form-number/index.html>

**Note 4:** USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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.

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 submit, indicate the application question number you are addressing. If applying for more than one trophy, be sure to indicate which trophy is addressed in each response.

1. How many Bontebok (*Damaliscus pygargus pygargus*) are you applying to import? Quantity: 1

2. At the time of the application, if bontebok is:

Alive, a. What is the approximate date of proposed take? \_\_\_\_\_

Dead, b. What is the date you took the animal? June 28 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 and SKULL with horn 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]:

3. ENTER the name and address of the **landowner** on whose property the bontebok was or will be taken:

Name: J P Theron

Business Name: Tuler of the Karoo

Address: Plaasfontein

Address: PO Box 683

City: De Aar

State/Province: North Cape

Country, Postal Code: South Africa 7000

*Please be aware that the bontebok is listed in Appendix II of CITES. As such, you must obtain a CITES export permit from South Africa. If you are not exporting the trophy from South Africa directly to the United States, you will need to obtain a CITES Re-export certificate from the re-exporting country.*

4. a. Attach a signed statement from the **landowner** giving you permission to cull a bontebok from their captive herd.
- b. If available, provide a copy of the landowner's Certification of Registration for the bontebok herd. (Note: this is **not** a copy of the export permit or certificate issued by a South African province.) In order to meet the criteria for a permit under the Endangered Species Act, the bontebok must be culled from a ranch that has been certified by the Government of South Africa under their bontebok program. If the ranch is not registered, we may be unable to issue an import permit.
5. **Complete name and address of overseas person or business shipping the trophy to you (this name will appear on the face of the permit).**

Name: *Nicolene Lenton*  
Business Name: *SaFari Cargo Systems*  
Address: *Holding 34, 5th Avenue, Bredell, 1623*  
Address:  
City: *Bredell*  
State/Province: *Gauteng*  
Country, Postal Code: *South Africa, 1623*

**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(ies) 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**).

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(ies) 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**).

Applicant's signature: *[Signature]* <sup>(b)</sup><sub>(6)</sub> Date: *02/22/2018*

*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):

Don Wallace - International Freight Systems of WA  
19803 First Avenue South Suite 102 Seattle WA 98148

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 state 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): Jamer Wilton (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.

**ADDRESS TO WHICH TROPHIES ARE TO  
BE SENT MUST BE CONFIRMED WITH CLIENT**

2nd Copy Mailed to Appropriate Nature Conservation Authority  
2nd Copy Mailed for a Period of Three Years  
2nd Copy Mailed to the British Library

**Nature Conservation  
Hunting Officer  
Professional Hunter**

**Said**

# SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

Division of Hunt	Commenced	Terminated
24	06	30
1	06	06
1	2011	2011

**Tick appropriate:** Provinces block where must tick place (separate sheet for each province)

Reading Skills (20%)	
Free Essays (15%)	
Classroom (45%)	

**Northern Province**  
**(1979)**

100-78694-12  
QRM

Reported on page 10

Western Cape  
(KIC)

Eastern Cape	
449	

**North Cape**

(page)

A

Post Period to (mark correct block with X)

## PROFESSIONAL HUNTER

Milken Y Koyen

21/11/2021

Code 1447

707055168081

Feb 14 2012

2006-2017

CLIENT	
Name.	JAMES (b) (6)
Permanent Postal Address	(b) (6)
MAILED 1st	(b) (6)
Code	(b) (6)
Country	USA
Passport No.	(b) (6)
Tel/Fax	(b) (6)
Date	(b) (6)
Signature	JAMES
WELSON	

HUNTING OUTFITTER

Name: JULES OF THE KAPOO

Business Address: P.O. BOX 683  
PLANTATION

LD No: 5403115005085

Tel No: 053 631 3290

Fax No: 005 / 2015 NC

Date: 20.04.2017

Signature: [Signature]

2239

2239

Farm Name Registration No.	Inspector District	Name & Residence Address of Land Owner	Hunting Permit Certificate/License No	Date Killed or Wounded	Species Killed or Wounded	Number Killed or Wounded	Sex F M	Conservation Level	Parts of Trophy to be Exported
MTKANEU	RICHMOND	DE THERON	393/394	24-7	MTKANEU ZEBRA	1	1		SC X1 BS X1
TIME CAMP	"	PLMKANEU	2013 / NC		BOYEBOK	1	1		FC X1, SC X1, MTKANEU
"	"	PO BOX 683	"		MTKANEU BEEBOK	2	2		FC X1, BS X1, SC X1, HOLLIS X2, SC X1
"	"	DE AIR, 200	"		SPRABOK	5	5		SC X5 BS X5
ROBERTSON	RICHMOND	MTKANEU IL. KOCK	1039/2012	7-30	LECHINE	1	1		SC X1, BS X1, F
DE ARKIN		PO BOX 134, RICHMOND		24-2017					

Item	Original	1st Copy	2nd Copy	3rd Copy
Working Order				

Forward to Federal Reserve authority within three years  
Return for a period of three years

Address to which responses are to be sent:  
anolsam@gmail.com

JIM WILSON

(b) (6)

MERIDIAN, ID (b) (6)

02-22-2018

Date

(b) (6)

Pay to the  
Order of

US Fish + Wild Life

\$ 100<sup>00</sup>

One hundred + <sup>00</sup>/<sub>100</sub>

Dollars



Photo  
Safe  
Deposit  
Details on back



Idaho  
Central  
CREDIT UNION

Your money.  
Your trusted choice.

For

Bontebok Permit

*[Signature]*

(b) (6)

TRAPSET ROUTING NUMBER

ACCOUNT NUMBER



RCVD MAR 08 2018

**PLEASE BE SURE TO MAIL THE COMPLETED CITES  
PERMIT TO:**

**D&L CHB, LLC  
1500 MIDWAY COURT, STE W201  
ELK GROVE VILLAGE, IL 60007  
CTC: LISA OR LAURA**



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 MAR 08 2018

LA

Return to: Division of Management Authority (DMA)  
U.S. Fish and Wildlife Service  
4401 N. Fairfax Drive, Room 212  
Arlington, VA 22203  
1-800-358-2104 or 703-358-2104

Type of Activity:

IMPORT OF SPORT-HUNTED BONTBOK TROPHIES FROM SOUTH AFRICA

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 Soulliere	1 b. First name Jason	1 c. Middle name or initial	1 d. Suffix
2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)

(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 P.O. Box)					
(b) (6)					
1 b. City	1 c. State	1 d. Zip code/Postal code	1 e. County/Province	1 f. Country	
Romeo	MI	(b) (6)	(b) (6)	U.S.A.	
2 a. Mailing Address (include if different than physical address, include name and address)					
(b) (6)					
2 b. City	2 c. State	2 d. Zip code/Postal code	2 e. County/Province	2 f. Country	

D. All applicants MUST complete	
1	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue _____ No <input checked="" type="checkbox"/>
3	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.
Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) _____ Date of signature (mm/dd/yyyy) 2/25/2018	



**E. IMPORT OF SPORT-HUNTED BONTEBOK TROPHIES from South Africa**

**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 were 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/bv-form-number/index.html> and return your original permit with that form.

**Note 2:** The bontebok is listed as endangered under the Endangered Species Act. Applications for endangered species permits must be published in the Federal Register for a 30-day public comment period. Allow at least **90 days** for the application to be processed.

**Note 3:** This application can only be used if you have hunted/will be hunting in **South Africa**. If you have or will be hunting in a different country, please use form 3-200-20: <http://www.fws.gov/international/permits/bv-form-number/index.html>

**Note 4:** USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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.

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 submit, indicate the application question number you are addressing. If applying for more than one trophy, be sure to indicate which trophy is addressed in each response.

1. How many Bontebok (*Damaliscus pygargus pygargus*) are you applying to import? Quantity: 1

2. At the time of the application, if bontebok is:

Alive, a. What is the approximate date of proposed take?

Dead, b. What is the date you took the animal? 9/13/2017

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, full 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]:  
Trophy Solutions  
114 Glen Ave, Industria  
Polokwane South Africa

3. ENTER the name and address of the **landowner** on whose property the bontebok was or will be taken:

Name

Street address

City/Province

Country, Postal Code

Mr Irvin Lam  
Spekboomberg  
Craddock South Africa

Please be aware that the bontebok is listed in Appendix II of CITES. As such, you must obtain a CITES export permit from South Africa. If you are not exporting the trophy from South Africa directly to the United States, you will need to obtain a CITES Re-export certificate from the re-exporting country.

4. a. Attach a signed statement from the landowner giving you permission to cull a bontebok from their captive herd. *See attached*
- b. If available, provide a copy of the landowner's Certification of Registration for the bontebok herd. (Note: this is not a copy of the export permit or certificate issued by a South African province.) In order to meet the criteria for a permit under the Endangered Species Act, the bontebok must be culled from a ranch that has been certified by the Government of South Africa under their bontebok program. If the ranch is not registered, we may be unable to issue an import permit.

5. **Complete name and address** of overseas person or business shipping the trophy to you (this name will appear on the face of the permit).

Name

Street address

City/Province

Country, Postal Code

*Trophy Solutions  
11th Gr. Ave  
Industria  
Polokwane, South Africa*

**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(ies) 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).

Taxidermist/Broker's signature: *Bisa Samant*

Date: *2/25/2018*

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(ies) 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).

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.*

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).

*Chicago*

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): **Dulans LLC**  
**1500 Midway Crt, Ste W201, Elk Grove Village IL 60007**
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 state 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): **Lisa Jamnik lisa@dlchb.com**  
**847-690-0690**

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.

**CUSTOMS POWER OF ATTORNEY**  
and  
**Acknowledgement of Terms and Conditions of Service**

Copyright 1995, National Customs Brokers and Forwarders Association of America, Inc.  
(Revised 07/04)

✓ appropriate box:

- ☒ Individual  
☐ Partnership  
☐ Corporation  
☐ Sole Proprietorship  
☐ Limited Liability Company

SS# ✓ (b) (6)

KNOW ALL MEN BY THESE PRESENTS: That, ✓ Jason (b) (6) Soulliere doing  
business as a ✓ INDIVIDUAL (Individual, partnership, corporation, sole proprietorship, or limited liability company) (Identify)  
under the laws of the State of Michigan,  
residing or having a principal place of business at ✓ (b) (6) Romeo MI (b) (6), 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 ✓ Jason (b) (6) Soulliere (Full name of attorney)  
caused these presents to be sealed and signed: (Signature) ✓ [Signature]  
(Capacity) ✓ N/A Date: ✓ 7/12/16  
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.





(b) (6)



Po Box 822  
Cradock, 5880  
South Africa

27 Fiere Street  
Cradock, 5880  
South Africa



www.tamsafaris.com

Tel: +27 48 881 1053  
Irvin: +27 82 652 6610  
Peter: +27 82 412 6766  
Stephen: +27 72 155 0570  
info@tamsafaris.com

11 September 2017

**To Whom It May Concern:**

This letter serves to confirm that;

Mr Jason (b) (6) Soulliere; Passport # (b) (6)

Address: (b) (6)

Romeo, MI

(b) (6) USA.

Will be hunting in South Africa with Tam Safari's in the Eastern Cape during September 2017.

He has permission to hunt one excess Bontebok from the registered group on the ranch, Spekboomberg, Cradock, South Africa.

Ranch: +27 488 811 053

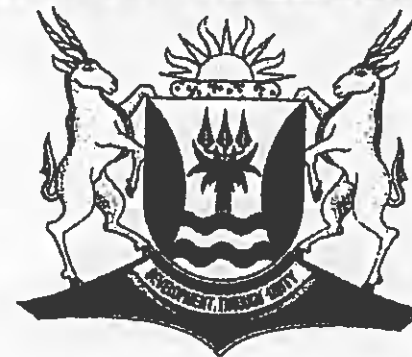
Mobile: +27 826 526 610

Sincerely

Irvin Tam

# **Certificate of Registration**

## **BONTEBOK HERD**



**It is hereby certified that the  
Bontebok herd on  
the property Spekboomberg, of  
Mr. Irvin Tam,  
in the Cradock district of the Eastern Cape,  
South Africa, is certified as pure on the  
13 May 2003**

**Presented to Mr. Irvin Tam  
Date: 13 May 2003**

  
**For: Chief Director: Environmental Affairs**

**Issued by: Department of Economic Affairs, Environment and Tourism  
Province of the Eastern Cape**

D&L CHB, LLC  
1500 MIDWAY CT. W201  
ELK GROVE VILLAGE, IL 60007

BANK ONE  
CHICAGO, IL 60670  
2-1-710

DATE	CHECK NUMBER
------	-----------------

02/26/18

(b) (4)

PAY

\*\*\*\*\*100DOLLARS&00CENTS

CHECK AMOUNT
--------------

PAY TO THE ORDER OF:

\$100.00\*\*

FISH & WILDLIFE

IL

Dennis Diebold

(b) (4)

RCVD MAR 08 2018

**PLEASE BE SURE TO MAIL THE COMPLETED CITES  
PERMIT TO:**

**D&L CHB, LLC  
1500 MIDWAY COURT, STE W201  
ELK GROVE VILLAGE, IL 60007  
CTC: LISA OR LAURA**



Department of Interior  
U.S. Fish and Wildlife Service

RCVD MAR 03 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 of Southern  
African Leopard and Namibian Southern White  
Rhinoceros

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 Campbell	1.b. First Name Baron	1.c. Middle Name/Initial (b) (6)
(b) (6)		

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

(b) (6)				
---------	--	--	--	--

## Section C: All applicants complete address information

1.a. (b) (6)				
1.b. City Bakersfield CA		1.c. State (b) (6)		1.f. Country USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

## Section D: All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount identified on page 2, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee -- attach documentation of fee exempt status as outlined in instructions. [50 CFR 13.11(d)]
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50 Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) Zisa Jamniah 2/25/2018
Please continue to next page



**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND  
NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit to the address on page one.**

**Note 2:** 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:** *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 4:** Certain hunting trophies, including leopard 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.

- **Complete all questions on the application.**
- **Mark questions that are not applicable with "N/A".**
- **If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.**
- **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.

DWL CORP LLC  
1500 Midway Crt, Ste W201  
EIK Grove Village, IL 60007

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

Lisa Jamnik  
lisaj@dichb.com  
847-690-0690

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):
- a. Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20.
- b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia  
Quantity:        (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).
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: N/A
- c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

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

- d. 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:
- e. Date wildlife is to be hunted:

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

Bushman Hunting Safaris

- g. 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]:

Bushman Hunting Safaris  
Plot 61-64 Block E Khonda Ind  
Morogoro 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).

permit 2010367

8. Complete name and address of overseas person or business shipping the trophy to you.

- a. 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:  
Address:  
City:  
State/Province:  
Country, Postal Code:

Bushman Hunting Safaris  
Plot No 61-64 Block E  
Khonda Ind Complex  
Morogoro Tanzania

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. 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:

2/25/2018

10. 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.*

11. 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

CUSTOMS POWER OF ATTORNEY  
and

Acknowledgement of Terms and Conditions of Service

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(Revised 07/04)

✓ appropriate box:

- ☒ Individual  
☐ Partnership  
☐ Corporation  
☐ Sole Proprietorship  
☐ Limited Liability Company

I.R.S.#

(b) (6)

KNOW ALL MEN BY THESE PRESENTS: That, ✓ Byron (b) (6) CAMPBELL  
business as a ✓ INDIVIDUAL (Full name of individual, partnership, corporation, sole proprietorship, or limited liability company) (Identify)  
residing or having a principal place of business at (b) (6) under the laws of the State of ✓ CALIFORNIA  
appoints ✓ D & L CHB, LLC (Grantee's Name) Bakersfield CA (b) (6) hereby constitutes 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, unloading 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, unloading, 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 ✓ Byron (b) (6) CAMPBELL  
caused these presents to be sealed and signed: (Signature) ✓ [Signature]  
(Capacity) ✓ N/A Date: 8-29-17  
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.



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# THE UNITED REPUBLIC OF TANZANIA

MINISTRY OF NATURAL RESOURCES AND TOURISM



## GAME HUNTING PERMIT

November 24, 2017 10:00:00

MAIN PERMIT

REFERENCE:

Monday November 24, 2017

PERMIT NO.

2010367

Start Date	November 27, 2017	End Date	November 27, 2017	Package Type	10000	Extra Days	1
Time	08:00:00	Time	18:00:00	Time	08:00:00	Time	18:00:00
Who holds Permit (Type)	INDIVIDUAL	Who holds Permit (Type)	INDIVIDUAL	Who holds Permit (Type)	INDIVIDUAL	Who holds Permit (Type)	INDIVIDUAL
License No.	10000	License No.	10000	License No.	10000	License No.	10000
and within the below address in the (Name area and license)	MOROGOTO DISTRICT, MOROGOTO, TZ						
issued by	MOROGOTO DISTRICT, MOROGOTO, TZ						
per	MOROGOTO DISTRICT, MOROGOTO, TZ						
Addressed to:	MOROGOTO DISTRICT, MOROGOTO, TZ						
Signature of holder	Signature of holder						
Signature of holder	Signature of holder						

Species	Sex	Age	Weight	Length	Wing	Tail	Ear	Foot	Claw	Skull	Horn	Antler	Other
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- The hunting Permit must be submitted to the District Commissioner of the District where the hunting is to take place.
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1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100

(b) (6)

Figure 1. The effect of the concentration of the inhibitor on the rate of polymerization of the monomer. The reaction conditions were:  $[M] = 0.05 \text{ mol/L}$ ,  $[AIBN] = 0.001 \text{ mol/L}$ ,  $[I] = 0.001 \text{ mol/L}$ ,  $[I] = 0.002 \text{ mol/L}$ ,  $[I] = 0.004 \text{ mol/L}$ ,  $[I] = 0.008 \text{ mol/L}$ ,  $[I] = 0.016 \text{ mol/L}$ ,  $[I] = 0.032 \text{ mol/L}$ ,  $[I] = 0.064 \text{ mol/L}$ ,  $[I] = 0.128 \text{ mol/L}$ ,  $[I] = 0.256 \text{ mol/L}$ ,  $[I] = 0.512 \text{ mol/L}$ ,  $[I] = 1.024 \text{ mol/L}$ ,  $[I] = 2.048 \text{ mol/L}$ ,  $[I] = 4.096 \text{ mol/L}$ ,  $[I] = 8.192 \text{ mol/L}$ ,  $[I] = 16.384 \text{ mol/L}$ ,  $[I] = 32.768 \text{ mol/L}$ ,  $[I] = 65.536 \text{ mol/L}$ ,  $[I] = 131.072 \text{ mol/L}$ ,  $[I] = 262.144 \text{ mol/L}$ ,  $[I] = 524.288 \text{ mol/L}$ ,  $[I] = 1048.576 \text{ mol/L}$ ,  $[I] = 2097.152 \text{ mol/L}$ ,  $[I] = 4194.304 \text{ mol/L}$ ,  $[I] = 8388.608 \text{ mol/L}$ ,  $[I] = 16777.216 \text{ mol/L}$ ,  $[I] = 33554.432 \text{ mol/L}$ ,  $[I] = 67108.864 \text{ mol/L}$ ,  $[I] = 134217.728 \text{ mol/L}$ ,  $[I] = 268435.456 \text{ mol/L}$ ,  $[I] = 536870.912 \text{ mol/L}$ ,  $[I] = 1073741.824 \text{ mol/L}$ ,  $[I] = 2147483.648 \text{ mol/L}$ ,  $[I] = 4294967.296 \text{ mol/L}$ ,  $[I] = 8589934.592 \text{ mol/L}$ ,  $[I] = 17179869.184 \text{ mol/L}$ ,  $[I] = 34359738.368 \text{ mol/L}$ ,  $[I] = 68719476.736 \text{ mol/L}$ ,  $[I] = 137438953.472 \text{ mol/L}$ ,  $[I] = 274877906.944 \text{ mol/L}$ ,  $[I] = 549755813.888 \text{ mol/L}$ ,  $[I] = 1099511627.776 \text{ mol/L}$ ,  $[I] = 2199023255.552 \text{ mol/L}$ ,  $[I] = 4398046511.104 \text{ mol/L}$ ,  $[I] = 8796093022.208 \text{ mol/L}$ ,  $[I] = 17592186044.416 \text{ mol/L}$ ,  $[I] = 35184372088.832 \text{ mol/L}$ ,  $[I] = 70368744177.664 \text{ mol/L}$ ,  $[I] = 140737488355.328 \text{ mol/L}$ ,  $[I] = 281474976710.656 \text{ mol/L}$ ,  $[I] = 562949953421.312 \text{ mol/L}$ ,  $[I] = 1125899906842.624 \text{ mol/L}$ ,  $[I] = 2251799813685.248 \text{ mol/L}$ ,  $[I] = 4503599627370.496 \text{ mol/L}$ ,  $[I] = 9007199254740.992 \text{ mol/L}$ ,  $[I] = 18014398509481.984 \text{ mol/L}$ ,  $[I] = 36028797018963.968 \text{ mol/L}$ ,  $[I] = 72057594037927.936 \text{ mol/L}$ ,  $[I] = 144115188075855.872 \text{ mol/L}$ ,  $[I] = 288230376151711.744 \text{ mol/L}$ ,  $[I] = 576460752303423.488 \text{ mol/L}$ ,  $[I] = 1152921504606846.976 \text{ mol/L}$ ,  $[I] = 2305843009213693.952 \text{ mol/L}$ ,  $[I] = 4611686018427387.904 \text{ mol/L}$ ,  $[I] = 9223372036854775.808 \text{ mol/L}$ ,  $[I] = 18446744073709551.616 \text{ mol/L}$ ,  $[I] = 36893488147419103.232 \text{ mol/L}$ ,  $[I] = 73786976294838206.464 \text{ mol/L}$ ,  $[I] = 147573952589676412.928 \text{ mol/L}$ ,  $[I] = 295147905179352825.856 \text{ mol/L}$ ,  $[I] = 590295810358705651.712 \text{ mol/L}$ ,  $[I] = 1180591620717411303.424 \text{ mol/L}$ ,  $[I] = 2361183241434822606.848 \text{ mol/L}$ ,  $[I] = 4722366482869645213.696 \text{ mol/L}$ ,  $[I] = 9444732965739290427.392 \text{ mol/L}$ ,  $[I] = 18889465931478580854.784 \text{ mol/L}$ ,  $[I] = 37778931862957161709.568 \text{ mol/L}$ ,  $[I] = 75557863725914323419.136 \text{ mol/L}$ ,  $[I] = 151115727451828646838.272 \text{ mol/L}$ ,  $[I] = 302231454903657293676.544 \text{ mol/L}$ ,  $[I] = 604462909807314587353.088 \text{ mol/L}$ ,  $[I] = 1208925819614629174706.176 \text{ mol/L}$ ,  $[I] = 2417851639229258349412.352 \text{ mol/L}$ ,  $[I] = 4835703278458516698824.704 \text{ mol/L}$ ,  $[I] = 9671406556917033397649.408 \text{ mol/L}$ ,  $[I] = 19342813113834066795298.816 \text{ mol/L}$ ,  $[I] = 38685626227668133590597.632 \text{ mol/L}$ ,  $[I] = 77371252455336267181195.264 \text{ mol/L}$ ,  $[I] = 154742504910672534362390.528 \text{ mol/L}$ ,  $[I] = 309485009821345068724781.056 \text{ mol/L}$ ,  $[I] = 618970019642690137449562.112 \text{ mol/L}$ ,  $[I] = 1237940039285380274899124.224 \text{ mol/L}$ ,  $[I] = 2475880078570760549798248.448 \text{ mol/L}$ ,  $[I] = 4951760157141521099596496.896 \text{ mol/L}$ ,  $[I] = 9903520314283042199192993.792 \text{ mol/L}$ ,  $[I] = 19807040628566084398385987.584 \text{ mol/L}$ ,  $[I] = 39614081257132168796771975.168 \text{ mol/L}$ ,  $[I] = 79228162514264337593543950.336 \text{ mol/L}$ ,  $[I] = 158456325028528675187087900.672 \text{ mol/L}$ ,  $[I] = 316912650057057350374175801.344 \text{ mol/L}$ ,  $[I] = 633825300114114700748351602.688 \text{ mol/L}$ ,  $[I] = 1267650600228229401496703205.376 \text{ mol/L}$ ,  $[I] = 2535301200456458802993406410.752 \text{ mol/L}$ ,  $[I] = 5070602400912917605986812821.504 \text{ mol/L}$ ,  $[I] = 10141204801825835211973625643.008 \text{ mol/L}$ ,  $[I] = 20282409603651670423947251286.016 \text{ mol/L}$ ,  $[I] = 40564819207303340847894502572.032 \text{ mol/L}$ ,  $[I] = 81129638414606681695789005144.064 \text{ mol/L}$ ,  $[I] = 162259276829213363391578010288.128 \text{ mol/L}$ ,  $[I] = 324518553658426726783156020576.256 \text{ mol/L}$ ,  $[I] = 649037107316853453566312041152.512 \text{ mol/L}$ ,  $[I] = 1298074214633706907132624082305.024 \text{ mol/L}$ ,  $[I] = 2596148429267413814265248164610.048 \text{ mol/L}$ ,  $[I] = 5192296858534827628530496329220.096 \text{ mol/L}$ ,  $[I] = 10384593717069655257060992658440.192 \text{ mol/L}$ ,  $[I] = 20769187434139310514121985316880.384 \text{ mol/L}$ ,  $[I] = 41538374868278621028243970633760.768 \text{ mol/L}$ ,  $[I] = 83076749736557242056487941267521.536 \text{ mol/L}$ ,  $[I] = 16615349947311448411297$

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SPECIES	AGE	AREA WHERE HUNTED	WEAPON USED	DATE	TIME	SEX	PREVIOUS RECORD	REMARKS
IMPALA	ONE	MOUNTAIN OF MOON	1300	08/1/77	11	M	SAFARI CLUB 1975	
THOMAS GAZELLE	ONE	MOUNTAIN OF MOON	1300	08/1/77	11	M	SAFARI CLUB 1975	
WILDLIFE	ONE	"	1300	08/1/77	11	M	SAFARI CLUB 1975	
BALLOON	ONE	MOUNTAIN OF MOON	1300	08/1/77	11	M	SAFARI CLUB 1975	
IMPALA	ONE	"	1300	08/1/77	11	M	SAFARI CLUB 1975	
IMPALA	ONE	"	1416	10/1/77	11	M	SAFARI CLUB 1975	
IMPALA	ONE	"	1416	11/1/77	11	M	SAFARI CLUB 1975	
BUFFALO	ONE	"	1300	11/1/77	11	M	SAFARI CLUB 1975	
LEOPARD	ONE	"	1300	11/1/77	11	M	SAFARI CLUB 1975	
SPOTTED HYPH	ONE	"	1300	12/1/77	11	M	SAFARI CLUB 1975	
IMPALA	ONE	"	1300	13/1/77	11	M	SAFARI CLUB 1975	
IMPALA	ONE	"	1300	14/1/77	11	M	SAFARI CLUB 1975	

1. 凡在本市行政区域内从事经营活动的个体工商户、企业法人、其他经济组织（以下简称“经营者”），均应当遵守本规定。  
 2. 经营者应当遵守国家和本市有关价格管理的法律法规，不得有下列行为：  
 （一）不执行政府指导价、政府定价；  
 （二）哄抬价格；  
 （三）价格欺诈；  
 （四）价格歧视；  
 （五）不正当价格竞争；  
 （六）牟取暴利；  
 （七）其他不正当价格行为。  
 3. 经营者应当明码标价，不得在标价之外加价出售商品或者提供服务，不得有变相加价或者其他不正当的价格行为。  
 4. 经营者应当建立进货查验制度，如实记录进货来源、数量、价格、日期等信息，并保存相关凭证。  
 5. 经营者应当建立价格管理制度，定期开展价格自查，发现价格违法行为应当及时纠正。  
 6. 经营者应当自觉接受社会监督，对消费者的投诉、举报应当及时处理，不得推诿、搪塞。  
 7. 经营者应当加强价格诚信建设，不得散布虚假信息，不得捏造、散布涨价信息，扰乱市场秩序。  
 8. 经营者应当遵守国家和本市有关价格管理的其他规定。

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D&L CHB, LLC  
1500 MIDWAY CT. W201  
ELK GROVE VILLAGE, IL 60007

(b) (4)

DATE	CHECK NUMBER
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02/26/18

(b) (4)

PAY

\*\*\*\*\*100DOLLARS&00CENTS

CHECK AMOUNT
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\$100.00\*\*

PAY TO THE ORDER OF:

FISH & WILDLIFE  
5275 LEESEBURG PIKE

FALLS CHURCH VA 22041 3805

(b) (4)

*Donna Diebold*

RCVD MAR 08 2018

**PLEASE BE SURE TO MAIL THE COMPLETED CITES  
PERMIT TO:**

**D&L CHB, LLC  
1500 MIDWAY COURT, STE W201  
ELK GROVE VILLAGE, IL 60007  
CTC: LISA OR LAURA**





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:** Division of Management Authority (DMA)  
U.S. Fish and Wildlife Service  
4401 N. Fairfax Drive, Room 212  
Arlington, VA 22203  
1-800-358-2104 or 703-358-2104

**Type of Activity:**

**IMPORT OF SPORT-HUNTED BONTEBOK TROPHIES FROM SOUTH AFRICA**

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 <b>Goeddel</b>	1 b. First name <b>Scott</b>	1 c. Middle name or initial	1 d. Suffix
2. Date of birth (mm/dd/yyyy)	3. Social Security No. <b>(b) (6)</b>	4. Occupation	5. Affiliation/ Doing business as (see instructions)
6 a. Telephone number <b>(b) (6)</b>	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		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>(b) (6)</b>			
1 b. City <b>Waterloo</b>	1 c. State <b>IL</b>	1 d. Zip code/Postal code <b>(b) (6)</b>	1 e. Country <b>USA</b>
2 a. Mailing Address (include if different than physical address; include name of contact person if applicable) <b>(b) (6)</b>			
2 b. City	2 c. State	2 d. Zip code/Postal code	2 e. Country

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <b>(Signature)</b> Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) <b>2/25/2018</b>



## E. IMPORT OF SPORT-HUNTED BONTEBOK TROPHIES from South Africa

**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 were 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/bv-form-number/index.html> and return your original permit with that form.

**Note 2:** The bontebok is listed as endangered under the Endangered Species Act. Applications for endangered species permits must be published in the Federal Register for a 30-day public comment period. Allow at least **90 days** for the application to be processed.

**Note 3:** This application can only be used if you have hunted/will be hunting in **South Africa**. If you have or will be hunting in a different country, please use form 3-200-20: <http://www.fws.gov/international/permits/bv-form-number/index.html>

**Note 4:** USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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.

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 submit, indicate the application question number you are addressing. If applying for more than one trophy, be sure to indicate which trophy is addressed in each response.

1. How many Bontebok (*Damaliscus pygargus pygargus*) are you applying to import? Quantity: 1

2. At the time of the application, if bontebok is:

Alive, a. What is the approximate date of proposed take? \_\_\_\_\_

Dead, b. What is the **date** you took the animal? 5/25/2017

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

taxidermy Africa  
P.O. Box 0976  
Humansdorp, South Africa

3. ENTER the name and address of the **landowner** on whose property the bontebok was or will be taken:

Name

Street address

City/Province

Country, Postal Code

Mr Greg Harvey  
Wildschuttsberg Game Reserve  
Sterk Stroom Distric  
Eastern Cape South Africa

*Please be aware that the bontebok is listed in Appendix II of CITES. As such, you must obtain a CITES export permit from South Africa. If you are not exporting the trophy from South Africa directly to the United States, you will need to obtain a CITES Re-export certificate from the re-exporting country.*

4. a. Attach a signed statement from the **landowner** giving you permission to cull a bontebok from their captive herd. *see attached*
- b. If available, provide a copy of the landowner's Certification of Registration for the bontebok herd. (Note: this is **not** a copy of the export permit or certificate issued by a South African province.) In order to meet the criteria for a permit under the Endangered Species Act, the bontebok must be culled from a ranch that has been certified by the Government of South Africa under their bontebok program. If the ranch is not registered, we may be unable to issue an import permit.

5. **Complete name and address** of overseas person or business shipping the trophy to you (this name will appear on the face of the permit).

Name

Street address

City/Province

Country, Postal Code

*Taxidermy Africa  
P.O. Box 0976  
Humansdorp, South Africa*

**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(ies) 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**).

Taxidermist/Broker's signature: *Sisa Jannet*

Date: *2/25/2018*

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(ies) 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**).

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.*

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).

*Chicago*

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):

1500 Midway Crt, Ste W201, Elk Grove Village, IL 60007

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 state 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):

Lisa Jamnik lisa@dlchb.com  
847-690-0690

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.



#3504

**CUSTOMS POWER OF ATTORNEY**  
and  
**Acknowledgement of Terms and Conditions of Service**

Copyright 1995, National Customs Brokers and Forwarders Association of America, Inc.  
(Revised 07/04)

✓ appropriate box: ☒ Individual  
☐ Partnership  
☐ Corporation  
☐ Sole Proprietorship  
☐ Limited Liability Company

S.S.# (b) (6)

KNOW ALL MEN BY THESE PRESENTS: That, ✓ SCOTT (b) (6) Goeddel doing  
business as a ✓ INDIVIDUAL (Full name of individual, partnership, corporation, sole proprietorship, or limited liability company) (Identify)  
residing or having a principal place of business at ✓ (b) (6) WATERLOO IL (b) (6) under the laws of the State of ✓ ILLINOIS  
appoints ✓ D&L CHE, LLC (Grantor'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 CHE, 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 ✓ SCOTT (b) (6) Goeddel (Full name of company)  
caused these presents to be sealed and signed: (Signature) ✓ Scott Goeddel  
(Capacity) ✓ N/A Date: 9/8/10  
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.



**WILDSCHUTSBERG**  
GAME RESERVE

P O Box 448; Queenstown  
Game Reserve:- 045-966 9789  
Reservations:- 045-966 9789  
Fax:- 045-966 9789

---

To Whom It May Concern:

I, Greg Harvey, have authorized

Scott Goeddel

(b) (6)

Waterloo  
Illinois

to shoot a Bonte-bok on the abovementioned farm. This hunt took place during  
May 2017.

Enclosed herewith a copy of the Certificate of Registration of the Bontebok Herd.

Regards

Greg Harvey



## ***Certificate of Registration***

### ***BONTEBOK HERD***



***It is hereby certified that the  
Bontebok herd on  
the property Wildschutsberg, of  
Mr.Greg Harvey,  
in the Sterkstroom District of the Eastern Cape,  
South Africa, is certified as pure on the  
3<sup>rd</sup> April 2006***

***Presented to Mr.G.Harvey***

***Date: 3<sup>rd</sup> April 2006***

---

***For; Chief Director: Environmental Affairs***

***Issued by: Department of Economic Affairs, Environment and Tourism  
Province of the Eastern Cape***

# SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION



No 37293

Duration of Hunt Commenced 25 / 5 / 2017 Terminated 25 / 5 / 2017  
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 (MP)	Western Cape (CNC)	Eastern Cape (EC) <input checked="" type="checkbox"/>	Northern Cape (NC)
---------------------	-----------------	--------------	------------------------	-----------------	-----------------	--------------------	---	--------------------

Post Permit to (mark correct block with X)

PROFESSIONAL HUNTER	
Name: Roy Wormald	
Business Address: CHIKWERO P.O. Box 487 CRADOCK	Code: 5880
I.D. No: 5608255164084	
PH Permit No: 49/2015 EC	
Date: 31/5/2017	Signature: Roy Wormald

CLIENT	
Name: Scott Goeddel	
Permanent Postal Address: Waterloo Illinois	
Code: (b) (6)	
Passport: (b) (6)	
Tel/Fax: (b) (6)	
Date: 31/5/2017	Signature: Scott Goeddel

HUNTING OUTFITTER	
Name: Wormald Hunting Adventures	
Business Address: CHIKWERO Box 487 Cradock	Code: 5880
I.D. No: 5608255164084	
Tel No: 0853059885	Fax No:
PH Permit No: HC 17/2015 EC	
Date: 31/5/2017	Signature: Roy Wormald

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 M	Conservation Levy	Parts of Trophy to be Exported
Greg Harvey	Sticks/lim	Nildschus Temburg	9FH 08566	25/5	Bontebok	1	1		Skull + Hide

Copies: Client Original White  
Hunting Outfitter 1st Copy Pink Forward to Nature conservation authority where hunt took place  
Taxidermist 2nd Copy Blue Retain for a period of three years  
Professional Hunter 3rd Copy Green Taxidermist  
Last Copy Yellow Remains in book  
NB: A voluntary charge of \$10 or C10 is levied for every trophy taken

Address to which trophies are to be sent: To USA - above address	
Country: .....	Trophy Export Date (Estimate): .....

## PROVINSIE VAN DIE OOS KAAP

## PROVINCE OF THE EASTERN CAPE

JAGLISENSIEHUNTING LICENCE

46026

## LISENSIEGELD

## LICENCE FEE

Ordonnansie op Natuur - en Omgewingsbewaring, 1994  
(Ordonnansie 19 van 1974) (artikel 27)

Nature and Environmental Conservation Ordinance 1974  
(Ordinance 19 of 1974) (section 27)

NIE OORDRAAGBAAR NIE

NOT TRANSFERABLE

Lisensie No. A  
Licence No.

Behoudens die bepallings van die Ordonnansie op Natuur en  
en Omgewingsbewaring, 1974 (Ordonnansie 19 van 1974),  
word 'n jaglisensie hierby uitgereik aan -

Subject to the provisions of the Nature and Environmental  
Conservation Ordinance 1974 (Ordinance 19 of 1974),  
a hunting licence is hereby issued to -

Voorletters en van  
Initials and surname

SCOTT GOENDEL

Woonadres  
Residential address

(b) (6)

(b) (6)

WATERLOO ILLINOIS

Ontvangs van voorgeskrewe lisensiegeld word hierby  
erken / Receipt of prescribed licence fee is hereby  
acknowledged



*Scott Goendel*  
Licensiehouer /  
licence holder

\* Direkteur van Natuur Bewaring / \* Ontvanger van Inkomste / \* Gemagtigde Persoon /  
\* Director of Nature Conservation / \* Receiver of Revenue / \* Authorised person

## VOORWAARDES

1. Hierdie lisensie tree in werking slegs indien dit deur die houer daarvan onderteken is.
2. Hierdie lisensie is geldig vir twaalf maande vanaf die datum van uitreiking daarvan.

\* SKRAP WAT NIE VAN TOEPASSING IS NIE

## CONDITIONS

1. This licence takes effect only if it is signed by the holder thereof.
2. This licence is valid for twelve months from the date of issue thereof.

\* DELETE WHICHEVER IS NOT APPLICABLE



**GAME FARM HUNTING PERMIT**

(Issued in terms of the provisions of the  
National Environmental Management:  
Biodiversity Act 2004, Act 10 of 2004)

PERMIT NUMBER: **GFH 08566 B**

NAME OF ISSUING AUTHORITY	
NAME	Dea
ADDRESS	Box 9656
ADDRESS	Queenstown
PROVINCE	EC

DETAILS OF HUNTER	
NAME	Scott
SURNAME	Goeddel
POSTAL ADDRESS	(b) (6)
ADDRESS	(b) (6)
ADDRESS	(b) (6)
TOWN	Waterloo Illovo
POSTAL CODE	
PROVINCE	
PARTICULARS OF PROFESSIONAL HUNTER (In case of hunting client)	NAME AND SURNAME: Roy Wilmald
	CONTACT NUMBER: (b) (6)
	PERMIT NUMBER: 44/2015 EC

DETAILS OF REGISTERED GAME FARM OWNER	
REGISTRATION CERTIFICATE NUMBER	
NAME: LANDOWNER	Greg Earnest
SURNAME: LANDOWNER	J. Harvey
REGISTERED FARM NAME AND NUMBER	Wildschutzberg Game Reserve
FARM SIZE (ha)	1721
DISTRICT NAME	Sterksdorp
PROVINCE	EC

HUNTING METHOD	
HUNTING INSTRUMENT	Rifle
HUNTING METHOD	Walk and Stalk

DETAILS OF SPECIES INVOLVED			
SPECIES		SEX (if known)	QUANTITY
COMMON NAME	SCIENTIFIC NAME		
Bontebok		male	one

DETAILS OF RESTRICTED ACTIVITIES INVOLVED	

PERMIT VALIDATION			
DURATION OF THE HUNT	FROM: 25-05-2017	TO: 25-05-2017	
PERIOD OF VALIDITY	FROM: 25-05-2017	TO: 25-05-2017	
DATE ISSUED:	25-05-2017		
SIGNATURE OF GAME FARM OWNER:	[Signature]		
SIGNATURE OF HUNTER:	S. Goeddel		

[Signature: G. Steyn]		[Signature]	
NAME OF ISSUING OFFICER:	[Signature]		
RECEIPT NUMBER	ENVIRONMENTAL AFFAIRS		
STAMP OF ISSUING AUTHORITY:	CHRIS WILMSTADT		
		PO BOX 9656 QUEENSTOWN 2271	

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)
------	----------------------

02/26/18

PAY  
\*\*\*\*\*100DOLLARS&00CENTS

CHECK AMOUNT
--------------

PAY TO THE ORDER OF:

\$100.00\*\*

FISH & WILDLIFE

IL

(b) (4)

*Don Dielerfeld*





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 BONTEBOK TROPHIES FROM SOUTH AFRICA**

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 Habel	1.b. First name Michael	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation	
5. Affiliation/ Doing business as (see instructions)			
6.a. Telephone number (b) (6)	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address

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
5. Principal officer title		4.d. Suffix	
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 Taylorsville	1.c. State UT	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province	1.f. Country	
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) -same-					
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country	

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.	
Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) <u>Atty. In Fact for Michael Habel</u> Date of signature (mm/dd/yyyy) <u>02/28/2018</u>	



**E. IMPORT OF SPORT-HUNTED BONTEBOK TROPHIES from South Africa**

- 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 were 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:** The bontebok is listed as endangered under the Endangered Species Act. Applications for endangered species permits must be published in the Federal Register for a 30-day public comment period. Allow at least **90 days** for the application to be processed.
- Note 3:** This application can only be used if you have hunted/will be hunting in **South Africa**. If you have or will be hunting in a different country, please use form 3-200-20: <http://www.fws.gov/international/permits/by-form-number/index.html>
- Note 4:** USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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.

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 submit, indicate the application question number you are addressing. If applying for more than one trophy, be sure to indicate which trophy is addressed in each response.

1. How many **Bontebok** (*Damaliscus pygargus pygargus*) are you applying to import? Quantity: 1
2. At the time of the application, if bontebok is:
  - Alive, a. What is the approximate date of proposed take? \_\_\_\_\_
  - Dead, b. What is the **date** you took the animal? June 5, 2017
  - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).  
Skull, Cape & Backskin
  - 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]:  
Karoo Taxidermy, 15 Van Der Byl St., Industrial Area, Graaff-Reinet, 6280 South Africa
3. ENTER the name and address of the **landowner** on whose property the bontebok was or will be taken:

Name:	<u>Greg Harvey</u>
Business Name:	<u>Wildschutsberg Game Reserve</u>
Address:	<u>PO Box 448</u>
Address:	<u>Queenstown, Sterkstroom District</u>
City:	<u>Eastern Cape</u>
State/Province:	<u>South Africa</u>
Country, Postal Code:	



*Please be aware that the bontebok is listed in Appendix II of CITES. As such, you must obtain a CITES export permit from South Africa. If you are not exporting the trophy from South Africa directly to the United States, you will need to obtain a CITES Re-export certificate from the re-exporting country.*

4. a. Attach a signed statement from the **landowner** giving you permission to cull a bontebok from their captive herd. **ATTACHED**
- b. If available, provide a copy of the landowner's **Certification of Registration** for the bontebok herd. (Note: this is **not** a copy of the export permit or certificate issued by a South African province.) In order to meet the criteria for a permit under the Endangered Species Act, the bontebok must be culled from a ranch that has been certified by the Government of South Africa under their bontebok program. If the ranch is not registered, we may be unable to issue an import permit. **ATTACHED**
5. **Complete name and address** of overseas person or business shipping the trophy to you (this name will appear on the face of the permit).

Name:  
Business Name: Karoo Taxidermy  
Address: 15 Van Der Byl Street, Industrial Area  
Address: PO Box 231  
City: Graaff-Reinet, 6280  
State/Province: South Africa  
Country, Postal Code:

**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(ies) 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**).

Taxidermist/Broker's signature: Atty. In Fact for Michael (b) (6) Habel Date: 02/28/2018

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(ies) 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**).

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.*

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):

HUNTER INT'L BROKERAGE SERVICES, INC.  
5674 Stoneridge Drive, Suite 209, Pleasanton, CA 94588

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 state 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):

Vanessa Tabugan  
Tel# (925) 417 5270 / E-mail: [import@b.hunter-international.net](mailto:import@b.hunter-international.net)

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.

TO: USFW DMA,  
BRANCH OF PERMITS, MS: IA

PLEASE MAIL ALL ORIGINAL PERMITS TO:

HUNTER INT'L BROKERAGE SERVICES  
5674 Stoneridge Drive, Suite 209  
Pleasanton, CA 94588

Tel: (925) 417 5270 Fax: (925) 417 0170



# SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

EC No 11621

Duration of Hunt:

Commenced: 01 / 06 / 17

Terminated: 14 / 06 / 17

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)	Mpumalanga (MPL)	Western Cape (CNC)	Eastern Cape (EC) <input checked="" type="checkbox"/>	Northern Cape (NC)
---------------------	-----------------	--------------	---------------------	-----------------	------------------	--------------------	---	--------------------

Post Permit to (Mark correct block with X)

<b>PROFESSIONAL HUNTER</b> Name: [Signature] Business Address: [Signature] I.D. No.: 9403145313082 P.H. Permit No.: 109/2017 EC Date: 15/06/17 Signature: [Signature]	<b>CLIENT</b> Name: [Signature] Permanent Postal Address: [Redacted] Code: [Redacted] Country: USA Pass: [Redacted] Tel/F: [Redacted] Date: [Redacted] Signature: [Signature]	<b>HUNTING OUTFITTERS</b> Name: [Signature] Business Address: [Signature] I.D. No.: 6507233142082 Tel No.: [Redacted] Fax No.: [Redacted] H.O. Permit No.: 58/2010 EC Date: 30/05/17 Signature: [Signature]
--	---	---

Farm Name Registration No.	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate / Licence No.	Date of Hunt		Species Killed / Wounded	Number Killed or Wounded	Sex		Part of Trophy to be Exported
				From	To			♂	♀	
Wild Schul 50419				01/06/17		Kudu	2			SKULL
						LACHUR	1			CAPE SKULL
						SOMERDOR	1			CAPE SKULL
						OSBORN	1			FEATHERS
						WIND DIES	1			SKIN FEET
						RED SOGG	1			SKULL CAPE
						MOB KAPO	1			SKULL CAPE
						EIGOND (L)	1			CAPE SKULL
						FOLLOW	1			CAPE SKULL
				14/06/17		WOLF HOG	1			CAPE SKULL

Client: Original  
 Hunting: 1st copy Forward to Nature Conservation authority where hunt took place  
 2nd copy Retain for a period of three years  
 Professional Hunter Last copy Remain in book

Address to which trophies are to be sent: [Signature]  
 Country: USA  
 Trophy Export Date (Estimate):



# ***Certificate of Registration***

## ***BONTEBOK HERD***



***It is hereby certified that the  
Bontebok herd on  
the property Wildschutsberg, of  
Mr. Greg Harvey,  
in the Sterkstroom District of the Eastern Cape,  
South Africa, is certified as pure on the  
3<sup>rd</sup> April 2006***

***Presented to Mr. G. Harvey  
Date: 3<sup>rd</sup> April 2006***

***For; Chief Director: Environmental Affairs***

***Issued by: Department of Economic Affairs, Environment and Tourism  
Province of the Eastern Cape***





**WILDSCHUTTSBERG**  
GAME RESERVE

P O Box 448; Queenstown  
Game Reserve:- 045-966 9789  
Reservations:- 045-966 9789  
Fax:- 045-966 9789

---

To Whom It May Concern:

I, Greg Harvey, have authorized

Jared Habel

(b) (6)

TAYLORSVALLEY  
VIRGINIA  
USA

to shoot a Bonte-bok on the abovementioned farm. This hunt took place during June 2017.

Enclosed herewith a copy of the Certificate of Registration of the Bontebok Herd.

The taxidermy attending to the mounting of the Bontebok is Karoo Taxidermy, telephone number 27 49 892 6151.

Regards

Greg Harvey

C# 10859

# CUSTOMS POWER OF ATTORNEY

and  
Acknowledgment of Terms and Conditions of Service

Social Security number (b) (6)  
Date of birth (b) (6)

Know all men by these presents: That, MICHAEL (b) (6) HABEL  
residing at (b) (6) (Full legal name of individual) (b) (6)  
Taylorville, UT  
P.O. Box is not accepted)

hereby constitutes and appoints: **HUNTER INTERNATIONAL BROKERAGE SERVICES, INC., its officers, authorized employees and duly appointed sub-agents** to act for and on its behalf as a true and lawful agent and attorney of the grantor named above for and in the name, place, and 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, carnet or other document required by law or regulation in connection with the importation, transportation, or exportation of any merchandise shipped or consigned 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 of manufacture 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, unloading 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 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, unloading, or operation of any vessel or other means of conveyance owned or operated by 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 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;

To waive the requirement of other Customs Brokers transmitting a copy of the customs entry CF7501 and the Customs Broker's bill of services directly to the undersigned grantor in accordance with CF 111.36(a) & (b). Such entry summary and bill will be transmitted through Hunter International Brokerage Services, Inc. It is also understood that the agreement between Hunter International Brokerage Services, Inc. and other Customs Brokers does not forbid or prevent the Customs Broker from having direct contact with the grantor in accordance with CFR 111.36(c)(3).

To generally to transact at the customs houses in any district any and all customs business, including making, signing, and filing of protests under section 514 of the Tariff Act of 1930, 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 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 forgoing power of attorney to remain in full force until notice of revocation in writing is duly given to and received by a District Director of Customs.

The undersigned grantor of this power of attorney hereby agrees to **HUNTER INTERNATIONAL BROKERAGE SERVICES, INC.** Terms and Conditions of Service, which are attached hereto and incorporated herein by reference.

IN WITNESS WHEREOF, the said (Print full legal name) MICHAEL (b) (6) HABEL  
has caused these presents to be sealed and signed: (Signature) [Signature]  
(Capacity) \_\_\_\_\_ (Date) 10/26/16

Important note: If you are the importer of record, payment to the broker will not relieve you of liability for Customs charges (duties, taxes or other debts owed Customs) in the event the charges are not paid by the broker. Therefore, if you pay by check, Customs charges may be paid with a separate check payable to the "U.S. Customs Service" which shall be delivered to Customs by the broker. Importers who wish to utilize this procedure must contact our office in advance to arrange timely receipt of duty checks.

**(Mandatory requirement to validate this POA is to provide a CLEAR copy of your passport or driver's license or have this document notarized and mail to our office at Hunter Int'l., 5674 Stoneridge Drive, Ste 209, Pleasanton, CA 94588, tel (925) 417-5270, fax (925) 417-0170)**



**HUNTER INT'L. BROKERAGE SERVICES, INC.**  
5674 STONERIDGE DR STE 209  
PLEASANTON, CA 94588-8539

Bank of America  
ACH R/T 121000358

(b) (4)

2/28/2018

PAY TO THE ORDER OF U.S. Fish & Wildlife Service

\$ \*\*100.00

One Hundred and 00/100\*\*\*\*\*

DOLLARS

U.S. Fish & Wildlife Service

EMO

Bontebok Import Prt; IRS#02-0634213

(b) (4)

AUTHORIZED SIGNATURE

Photo Safe Deposit®

Details on Back.



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 OF BONTEBOK  
TROPHIES FROM SOUTH AFRICA**

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 <b>CUNNINGHAM</b>	1.b. First Name <b>SAMUEL</b>	1.c. Middle Name/Initial <b>(b) (6)</b>	1.d. Suffix <b>NA</b>
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number <b>(b) (6)</b>	3.a. Alternate Telephone Number <b>(b) (6)</b>	

**Section B**

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

**Section C: All applicants complete address information**

1.a. Physical address <b>(b) (6)</b>				
1.b. City <b>AMARILLO</b>	1.c. State <b>TEXAS</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province <b>(b) (6)</b>	1.f. Country <b>USA</b>
2.a. Mailing address (Include if different than physical address; Include name of contact person if applicable) <b>SAME</b>				
2.b. City <b>SAME</b>	2.c. State <b>SAME</b>	2.d. Zip code/Postal code <b>SAME</b>	2.e. County/Province <b>SAME</b>	2.f. Country <b>SAME</b>

**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>(b) (6)</b> <b>03/05/2018</b>
Please continue to next page



**IMPORT OF SPORT-HUNTED BONTBOK TROPHIES from South Africa**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** The bontbok is listed as endangered under the Endangered Species Act. Applications for endangered species permits must be published in the Federal Register for a 30-day public comment period. Allow at least 90 days for the application to be processed.

**Note 4:** This application can only be used if you have hunted/will be hunting in South Africa. If you have or will be hunting in a different country, please use form 3-200-20

**Note 5:** *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:
  - 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;
  - 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
  - The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

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)?

SAME

(b) (6)

(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. How many Bontebok (*Damaliscus pygargus pygargus*) are you applying to import? Quantity: 1

a. At the time of the application, the specimen(s) is:

Alive

☒ Dead

b. What is the approximate date of proposed take? NA

c. What is the date you took the animal? 07/31/2014

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]:

Splitting Image Taxidermy, The Budget Building, 14 Ultenhag Road,  
Sydenham, 6001 Port Elizabeth, RSA

5. ENTER the name and address of the landowner on whose property the bontebok was or will be taken:

Owners name: Lois Marais  
Farm Name: Langkloof  
District: Cradock  
Address: P.O. Box 558  
City: Cradock  
State/Province: East Cape 5580  
Country, Postal Code: RSA

Please be aware that the bontebok is listed in Appendix II of CITES. As such, you must obtain a CITES export permit from South Africa. If you are not exporting the trophy from South Africa directly to the United States, you will need to obtain a CITES Re-export certificate from the re-exporting country.

Attached

6. Attach a signed statement from the landowner giving you permission to cull a bontebok from their captive herd.

Attached

7. If available, provide a copy of the landowner's Certification of Registration for the bontebok herd. (Note: this is not a copy of the export permit or certificate issued by a South African province.) In order to meet the criteria for a permit under the Endangered Species Act, the bontebok must be culled from a ranch that has been certified by the Government of South Africa under their bontebok program. If the ranch is not registered, we may be unable to issue an import permit.

Attached

PERMIT / CERTIFICATE 165212



## CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

X	EXPORT
	RE-EXPORT
	IMPORT
	OTHER

**ORIGINAL**

2. Valid until 09.10.2017

3. Importer (name and address) <b>Samuel (b) (6) Cunningham</b> <b>Amarillo</b> <b>Texas, (b) (6), USA</b>				4. Exporter / Re-exporter (name, address and country) <b>Splitting Image Taxidermy</b> <b>The Badger Building</b> <b>14 Uitenhag Road</b> <b>Sydenham, 6001</b> <b>Port Elizabeth, RSA</b>							
3a. Country of Import <b>United States of America</b>				6. Name, address, national seal / stamp and country of Management Authority  <b>Department of Environmental Affairs</b> <b>Private Bag X447</b> <b>PRETORIA</b> <b>0001</b> <b>SOUTH AFRICA</b>							
5. Special conditions <b>Registered Bontebok Breeder</b> <b>L. Marais This is a TOPS integrated</b> <b>Langkloof permit. Blocks 14 &amp; 15 of this</b> <b>Craddock permit must be completed</b> <b>RSA prior to Export</b> <small>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. Permit / certificate valid for one consignment only.</small>											
5a. Purpose of the transaction (see reverse) <b>H</b>		5b. Security stamp No. <b>1353762</b>									
7.6. 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	
7.8 <b>Damaliscus P. Pygargus</b> <b>Bontebok</b>				9. <b>Full mount</b>		10. <b>II, (w)</b>		11. <b>One (1)</b>		11a.	
12. Country of origin*		Permit No.		Date		12a. Country of last re-export		Certificate No.		Date	
7.8		12. Country of origin*		Permit No.		Date		12a. Country of last re-export		Certificate No.	
7.8		12. Country of origin*		Permit No.		Date		12a. Country of last re-export		Certificate No.	
7.8		12. Country of origin*		Permit No.		Date		12a. Country of last re-export		Certificate No.	
7.8		12. Country of origin*		Permit No.		Date		12a. Country of last re-export		Certificate No.	
7.8		12. Country of origin*		Permit No.		Date		12a. Country of last re-export		Certificate No.	
7.8		12. Country of origin*		Permit No.		Date		12a. Country of last re-export		Certificate No.	
7.8		12. Country of origin*		Permit No.		Date		12a. Country of last re-export		Certificate No.	
7.8		12. Country of origin*		Permit No.		Date		12a. Country of last re-export		Certificate No.	
7.8		12. Country of origin*		Permit No.		Date		12a. Country of last re-export		Certificate No.	
7.8		12. Country of origin*		Permit No.		Date		12a. Country of last re-export		Certificate No.	
7.8		12. Country of origin*		Permit No.		Date		12a. Country of last re-export		Certificate No.	
7.8		12. Country of origin*		Permit No.		Date		12a. Country of last re-export		Certificate No.	
7.8		12. Country of origin*		Permit No.		Date		12a. Country of last re-export		Certificate No.	
7.8		12. Country of origin*		Permit No.		Date		12a. Country of last re-export		Certificate No.	
7.8		12. Country of origin*		Permit No.		Date		12a. Country of last re-export		Certificate No.	
7.8		12. Country of origin*		Permit No.		Date		12a. Country of last re-export		Certificate No.	
7.8		12. Country of origin*		Permit No.		Date		12a. Country of last re-export		Certificate No.	
7.8		12. Country of origin*		Permit No.		Date		12a. Country of last re-export		Certificate No.	
7.8		12. Country of origin*		Permit No.		Date					

# SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

EC 0007121

Duration of Hunt: Commenced: 31, 07, 14 Terminated: 08, 08, 14

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)	Mpumalanga (MPL)	Western Cape (WC)	Eastern Cape (EC) X	Northern Cape (NC)
---------------------	-----------------	--------------	---------------------	-----------------	------------------	-------------------	---------------------	--------------------

Post Permit to (Mark correct block with X)

<b>PROFESSIONAL HUNTER</b> Name: M.R. Hoode Business Address: 6 NEWINGTON Rd KENTON-ON-SEA Code: 6191 I.D. No.: 89 08 18 5232084 P.H. Permit No.: 203/2011 EC Date: 08/08/14 Signature:	<b>CLIENT</b> Name: Samuel Cunningham Permanent Postal Address: place Amarillo TX Code: Country: USA Passport No.: Tel/Fax: Date: 08/08/14 Signature:	<b>HUNTING OUTFITTERS</b> Name: John X SAFARIS Business Address: BOX 893 GRAHAMSTOWN Code: 6140 I.D. No.: 5710 20 9047 002 Tel No.: 0466224808 Fax No.: H.O. Permit No.: 55/2013 EC Date: 08/08/14 Signature:
--	---	---

Farm Name Registration No.	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate / Licence No.	Date of Hunt		Species Killed / Wounded	Number Killed or Wounded	Sex		Part of Trophy to be Exported
				From	To			♂	♀	
LANGKLOOF	GRADOCK	L. Morais	574/1102							
			GFH04964			Bontebok	1	✓		Skull Fullcape

Client: Original  
 Hunting: 1st copy Forward to Nature Conservation authority where hunt took place  
 2nd copy Retain for a period of three years  
 Professional Hunter: Last copy Retain in book

Address to which trophies are to be sent:  
 Code:  
 Country: Trophy Export Date (Estimate):



# GAME FARM HUNTING PERMIT

(Issued in terms of the provisions of the National Environmental Management Biodiversity Act 2004, Act 10 of 2004)

PERMIT NUMBER: GFH 04964

B

NAME OF ISSUING AUTHORITY	
NAME	DEDEA
ADDRESS	PO Box 386
ADDRESS	GRAAF-REINET
PROVINCE	E.C.

DETAILS OF HUNTER	
NAME	Samuel
SURNAME	Cunningham
POSTAL ADDRESS	(b) (6)
ADDRESS	(b) (6)
ADDRESS	(b) (6)
TOWN	Amantlo, TX
POSTAL CODE	(b) (6)
PROVINCE	TX
PARTICULARS OF PROFESSIONAL HUNTER (In case of hunting client)	NAME AND SURNAME: M.R. HALL CONTACT NUMBER: 046622 4888 PERMIT NUMBER: PH 203 / 11 EC

DETAILS OF REGISTERED GAME FARM OWNER	
REGISTRATION CERTIFICATE NUMBER	M11 / 54 10 10 50 45 088
NAME: LANDOWNER	LOUIS B.
SURNAME: LANDOWNER	MALAI
REGISTERED FARM NAME AND NUMBER	LANGKLOOF
FARM SIZE (ha)	4000 HA.
DISTRICT NAME	GRADOCIC
PROVINCE	E.C.

HUNTING METHOD	
HUNTING INSTRUMENT	RIFLE
HUNTING METHOD	WALK & STALK

SPECIES		SEX (if known)	QUANTITY
COMMON NAME	SCIENTIFIC NAME		
BONTBOK		MALE	X 1
BLACK WILDEBEEST		MALE	X 1

DETAILS OF RESTRICTED ACTIVITIES INVOLVED	

PERMIT VALIDATION			
DURATION OF THE HUNT	FROM: 31/08/14	TO: 08/08/14	
PERIOD OF VALIDITY	FROM: 4/08/14	TO: 08/08/14	
DATE ISSUED:	4/08/14		
SIGNATURE OF GAME FARM OWNER:			
SIGNATURE OF HUNTER:			

NAME OF ISSUING OFFICER:	SIGNATURE OF ISSUING OFFICER:
RECEIPT NUMBER	
STAMP OF ISSUING AUTHORITY:	



Question #16



**KAROO  
SAFARIS** (Pty) Ltd

Reg No: 920324607

**BERNARD MARAIS**  
"Langkloof"  
P.O. Box 558  
Craddock 5880  
Rep. of South Africa

Tel: (048) 881 2223  
Tel: (048) 881 3529 (lodge)  
International Tel. & Fax:  
011-27-48-881-2223  
karoosafaris@isat.co.za

**INVITATION LETTER TO HUNTER**

**TO WHOM IT MAY CONCERN**

I, the undersigned,

**BERNARD MARAIS**  
(ID 8212125038086)  
Owner of KAROO SAFARIS CC, Eastern Cape, P O Box 558, Craddock 5880,  
Rep of Sout Africa

Duly invite and grant permission to

**MR S CUNNINGHAM**

(Passport NO. (b) (6))

(b) (6)

Amarillo

Texas

(b)

(b) SA

To hunt one (1) **BONTEBOK** male from my private herd on my property Agtersneeuberg Game Reserve in the Eastern Cape.

In doing so, he will in no way endanger the future of the Bontebok as due to the surplus, it is essential to remove old infertile males and culling is done by this method.

Contact details at KAROO SAFARIS CC : Tel 011-27-48-8812223

E-mail [karoosafaris@isat.co.za](mailto:karoosafaris@isat.co.za)

Hunting dates: 31 July 2014 - 8 August 2014

  
**BERNARD MARAIS**

PH Cert No -PH31/2013

Hunting Contr Cert No 11/2013EC

**Certificate of Registration**

**BONTEBOK HERD**



**It is hereby certified that the  
Bontebok herd on  
the property Agtersneeuberg, of  
Mr.Louis Marais,  
in the Cradock district of the Eastern Cape,  
South Africa, is certified as pure on the  
4 October 2000**

**Presented to Mr.L.Marais**

**Date: 4 October 2000**

**For; Chief Director: Environmental Affairs**

**Issued by: Department of Economic Affairs, Environment and Tourism  
Province of the Eastern Cape**

8. **Complete name and address of overseas person or business shipping the trophy to you (this name will appear on the face of the permit).**

Name: Douglas Cockroft  
Business Name: Splitting Image Taxidermy  
Address: The Budget Building  
Address: 14 Uitenhage Road Sydenham, 6001  
City: Port Elizabeth  
State/Province: East Cape  
Country, Postal Code: RSA

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. **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).

Taxidermist/Broker's signature: \_\_\_\_\_ Date: \_\_\_\_\_

10. **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).

Applicant's signature: Sam F. Slinger Date: 03/05/18

*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 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).

SAM CUNNINGHAM

AMARILLO, TX

Date 03/05/2018

PAY  
TO THE  
ORDER OF

US Fish & Wildlife Service

\$ 100.00

One Hundred & 00/100

DOLLARS



FirstBank  
Southwest  
Amarillo

MEMO

Bankshot Impact Permit Application

Sam [Signature]



---

## Mar 14 2018 4:30:01; Acknowledgement letter for Permit No. "82699C"

2 messages

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**SPITS-II Production Email Messenger** <permits@fws.gov>

Wed, Mar 14, 2018 at 4:30 PM

Reply-To: permits@fws.gov

To: (b) (6)

Cc: permits@fws.gov

JAMES (b) (6) LINES

(b) (6)

COLLEYVILLE, TX (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 03/14/2018; check number "NOT AVAILABLE" accompanied the application for JAGUAR. Your application has been assigned the following PRT identification number: MA82699C-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.

---

**Lines, Jim** (b) (6)

Wed, Mar 14, 2018 at 7:17 PM

To: "permits@fws.gov" <permits@fws.gov>

To whom it may concern:

I did not submit an application for a Jaguar! I submitted one for an elephant.

Please call me at (b) (6)

James Lines

[Quoted text hidden]





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: 1A  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

**Type of Activity:**

**Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

RCVD MAR 14 2018

LB

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

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

<b>B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution</b>			
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

<b>C. All applicants complete address information</b>			
1 a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes) (b) (6)			
1 b. City Colleyville	1 c. State TX	1 d. Zip code/Postal code (b) (6)	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			

<b>D. All applicants MUST complete</b>	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA34431L-0 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) <u>James Lines</u> Date of signature (mm/dd/yyyy) <u>2/28/2018</u>	

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**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 were 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:** The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: <sup>1</sup> \_\_\_\_\_ (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: <sup>1</sup> \_\_\_\_\_ (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: <sup>N/A</sup> \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:

- Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
- Date wildlife is to be hunted:
- Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:

- Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild:

Leopard - Farm Moedhou (Kleeberg) # 112, Okahandja, Okavango, Otjozondjupa of Namibia; Elephant - Mahango National Park, Divundu, Rundu, Kavango East

- Date wildlife was hunted: June 1 - 12, 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, tusks, horn

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]:

The Yellow Shark Holdings (Pty) Ltd.  
P.O. Box 81413  
Olympia - Windhoek, Republic of Namibia

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 appear on the face of the export permit].

	Elephant	Leopard
Name:	Abiliu Hihuilopo Snr	Brink Grobler
Business Name:		
Address:	3674 Vinetta	92 Nelson Mandela Avenue
Address:		Stillwater # 5
City:		
State/Province:	Swakopmund	Klein Windhoek
Country, Postal Code:	Namibia	Namibia

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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:** James Lines **Date:** 2/28/2018

*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.*

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 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):

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. Jones  
(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.



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

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

RCVD MAR 16 2018

LS

**Federal Fish and Wildlife Permit Application Form**

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

Type of Activity:

**IMPORT OF SPORT-HUNTED BONTBOK TROPHIES FROM SOUTH AFRICA**

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 <b>Dabney</b>	1.b. First name <b>Joseph</b>	1.c. Middle name or initial <b>(b) (6)</b>	1.d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Social Security No. <b>(b) (6)</b>	5. Affiliation/ Doing business as (see instructions)	
5.a. Telephone number <b>(b) (6)</b>	5.b. Alternate telephone number <b>(b) (6)</b>	5.c. Fax number <b>N/A</b>	5.d. E-mail address <b>(b) (6)</b>

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>(b) (6)</b>				
1.b. City <b>Greenback</b>	1.c. State <b>TX</b>	1.d. Zip code/Postal code: <b>(b) (6)</b>	1.e. County/Province <b>(b) (6)</b>	1.f. Country <b>USA</b>
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) <b>N/A</b>				
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter 1 of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <b>(b) (6)</b>	
Signature (in blue ink) <b>Joseph Dabney</b>	Date of signature (mm/dd/yyyy) <b>03/12/2018</b>



## E. IMPORT OF SPORT-HUNTED BONTEBOK TROPHIES from South Africa

**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 were 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:** The bontebok is listed as endangered under the Endangered Species Act. Applications for endangered species permits must be published in the Federal Register for a 30-day public comment period. Allow at least **90 days** for the application to be processed.

**Note 3:** This application can only be used if you have hunted/will be hunting in **South Africa**. If you have or will be hunting in a different country, please use form 3-200-20: <http://www.fws.gov/international/permits/by-form-number/index.html>

**Note 4:** USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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.

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 submit, indicate the application question number you are addressing. If applying for more than one trophy, be sure to indicate which trophy is addressed in each response.

1. How many Bontebok (*Damaliscus pygargus pygargus*) are you applying to import? Quantity: 1

2. At the time of the application, if bontebok is:

Alive, a. What is the approximate date of proposed take? \_\_\_\_\_

Dead, b. What is the date you took the animal? 05/10/2017

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

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]:

Winterberg Taxidermy, Farm Haddon,  
Adelaide 5760, Eastern Cape, South Africa

3. ENTER the name and address of the landowner on whose property the bontebok was or will be taken:

Name: Frans Bussiahn  
Business Name: Mankazana Safaris  
Address: P.O. Box 139  
Address: Lemoenkraal Farm  
City: Adelaide  
State/Province: Eastern Cape  
Country, Postal Code: South Africa 5760

*Please be aware that the bontebok is listed in Appendix II of CITES. As such, you must obtain a CITES export permit from South Africa. If you are not exporting the trophy from South Africa directly to the United States, you will need to obtain a CITES Re-export certificate from the re-exporting country.*

4. a. Attach a signed statement from the **landowner** giving you permission to cull a bontebok from their captive herd.
  - b. If available, provide a copy of the landowner's Certification of Registration for the bontebok herd. (Note: this is not a copy of the export permit or certificate issued by a South African province.) In order to meet the criteria for a permit under the Endangered Species Act, the bontebok must be culled from a ranch that has been certified by the Government of South Africa under their bontebok program. If the ranch is not registered, we may be unable to issue an import permit.
5. **Complete name and address** of overseas person or business shipping the trophy to you (this name will appear on the face of the permit).

Name: *Lynette TAVARES*

Business Name: *EM IAC*

Address: *P.O. Box 753, Kelvin 2054, Sandton, RSA*

Address: *53 Maple St, Pomona, Kompton Park, Gauteng, RSA*

City: *Kelvin Sandton*

State/Province: *Gauteng*

Country, Postal Code: *South Africa 2054*

**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(ies) 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**).

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(ies) 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**).

Applicant's signature: *Joseph (b) (6) Dabney* Date: *03/12/18*

*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.*



**MANKAZANA SAFARIS**

P.O. Box 139, Adelaide, 5760

Eastern Cape, R.S.A.

Tel/Fax: 046 684 0802

Mankazana Safaris

Lemoenkraal

PO Box 139

Adelaide

5760

South Africa

15 January 2018

To Whom It may Concern

This is to confirm that Mr. J. (b) (6) Dabney, of (b) (6) Greenback, TN, (b) (6) USA, legally hunted one bontebok ram (D.p. pygargus), during the period 5 – 16 May 2017, on Fairholme Farm, situated near Grahamstown, Eastern Cape, South Africa. The animal was hunted with my full knowledge and permission.

The bontebok herd on Fairholme is hunted sustainably, with only lone rams being harvested, as and when, numbers allow this action.

Kindly find attached a copy of the Fairholme bontebok herd's registration certificate.

Sincerely

Frans Bussiahn

Owner: Fairholme Farm

Outfitter: HC 71/15 EC

Professional Hunter: PH 211/15 EC



Province of the  
**EASTERN CAPE**  
DEPARTMENT OF ECONOMIC DEVELOPMENT  
ENVIRONMENTAL AFFAIRS & TOURISM

P/Bag X0054, BHISHO  
South Africa, 5605  
Phone: +27 (43) 605 7156  
Fax: 086 746 6216  
Web: [www.deaet.ecprov.gov.za](http://www.deaet.ecprov.gov.za)  
E-mail: [buntu.mzamo@dedea.gov.za](mailto:buntu.mzamo@dedea.gov.za)

Enquiries:	A.B. Mzamo	Reference #:	Bont. Frans Bussiahn
E-mail:	<a href="mailto:Buntu.mzamo@dedea.gov.za">Buntu.mzamo@dedea.gov.za</a>	Date:	12 March 2018

Mr. F. Bussiahn  
P.O. Box 139  
Adelaide  
5760

Dear Mr. F. Bussiahn

**REGISTRATION OF BONTEBOK.**

It is my pleasure to inform you that your Bontebok herd (20) on the property Fairholm Farm in Grahamstown has been registered as a pure herd. Congratulations!

The registration is done, based on the declaration received from you dated 06 April 2017 & DNA results which state that since the introduction of this herd, no contamination by any Blesbuck, took place. The registration is done for the property Fairholm farm in the said town of the Eastern Cape.

This certification is extremely valuable and you should do everything possible to retain the purity of your herd. Export permits for sport-hunted Bontebok trophies and permits to capture, sell and transport Bontebok, will only be issued in respect of registered herds.

Periodic re-inspections of registered herds will be carried out in future and it is in your own interest to ensure that no contamination of your valuable herd occurs. In the case of any possible contamination, this office must immediately be informed.

Once again, congratulations and thanks for your contribution towards Environmental Conservation.

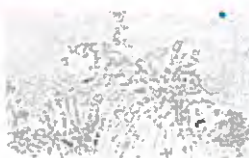
This letter serves as an official proof of your registration.

Yours truly,

P. Mzazi-Geja

Date: 12/03/2018

Director Environmental Affairs; Eastern Cape





# REGISTRATION CERTIFICATE

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

CERTIFICATE NUMBER: 30962

NAME OF ISSUING AUTHORITY	
NAME	DEDEAT
ADDRESS	PRIVATE BAG X 1006
ADDRESS	GRAHAMSTOWN
PROVINCE	EASTERN CAPE

PROVINCIAL DEPARTMENT	NATIONAL DEPARTMENT
CAPTIVE BREEDING OPERATIONS	COMMERCIAL EXHIBITION EXHIBITION
<input checked="" type="checkbox"/> GAME FARMS	NURSERIES
SCIENTIFIC INSTITUTIONS	SANCTUARIES
REHABILITATION FACILITIES	WILDLIFE TRADERS
UNIQUE REGISTRATION NUMBER	B126 / 6903105227085

DETAILS OF CERTIFICATE HOLDER			
NAME	FRANS	ID NO.	6903105227085
SURNAME	BUSSIAHN	PASSPORT NO.	
POSTAL ADDRESS	RESIDENTIAL ADDRESS		
ADDRESS	P. O. Box 139	FAIRHOLM FARM	
ADD. S			
ADDRESS			
TOWN	ADELAIDE	GRAHAMSTOWN	
POSTAL CODE	5160	6140	
PROVINCE	EASTERN CAPE	EASTERN CAPE	

PROPERTY WHERE OPERATION WILL BE CONDUCTED	
NAME AND SURNAME OF APPLICANT	F. BUSSIAHN
NAME AND SURNAME OF AGENT	N/A
PHYSICAL ADDRESS OF FACILITY	FAIRHOLM FARM
PHYSICAL ADDRESS OF FACILITY	GRAHAMSTOWN
DISTRICT NAME	MAKANA
PROVINCE	EASTERN CAPE
REGISTERED NAME AND NUMBER (in the case of game farm)	

PARTICULARS OF SPECIES			
SPECIES		SEX	QUANTITY
COMMON NAME	SCIENTIFIC NAME	(If known)	
SCATEBOX	<i>Dendrocygus pygargus</i>	Mixed	20 (TWENTY)
COMMON REEDBUCK	<i>Redunca arundinum</i>	Mixed	20 (TWENTY)

CERTIFICATE VALIDATION			
PERIOD OF VALIDITY	FROM:	26/04/2017	TO: 26/04/2020
RECEIPT NUMBER	P		

SIGNATURE ISSUING OFFICER	SIGNATURE CERTIFICATE HOLDER

DEPARTMENT OF ECONOMIC DEVELOPMENT  
AND ENVIRONMENTAL AFFAIRS

DATE STAMP

2017-04-26  
Private Bag X1006  
Grahamstown 6140



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):

Coppersmith, Attn. Tammy Lewis  
114 Southfield Pkwy, Suite 170  
Forest Park, GA 30297

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 state 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 (b) (6) have questions about the application? (Include name, phone number, and email): Joseph Dabney

(b) (6)  
(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.

JOSEPH M. DARNEY  
[REDACTED]  
Greendale, IN [REDACTED]  
DATE 3-12-18

PAY TO THE ORDER OF U.S. Fish and Wildlife Service \$ 100.00  
One hundred and 00/100 DOLLARS

 **REGIONS**  
FOR Bentley Bay Post Permit Joseph M. Darney  
[REDACTED]  
Member FDIC

Photo Safe Deposit®  
Details on back



Department of Interior  
U.S. Fish and Wildlife Service

RCVD MAR 22 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 OF BONTEBOK  
TROPHIES FROM SOUTH AFRICA

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 <b>Alajjayan</b>	1 b. First Name <b>Haroutyun</b>	1 c. Middle Name/Initial	1 d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number	3 a. Alternate Telephone Number	

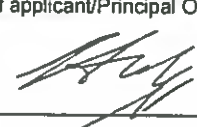
## Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

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>(b) (6)</b>				
1 b. City <b>Chatsworth</b>	1 c. State <b>CA</b>	1 d. Zip code/Postal code <b>(b) (6)</b>	1 e. County/Province	1 f. Country <b>USA</b>
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)

Please continue to next page

**IMPORT OF SPORT-HUNTED BONTBOK TROPHIES from South Africa**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit to the address on page one.

**Note 2:** 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:** The bontbok is listed as endangered under the Endangered Species Act. Applications for endangered species permits must be published in the Federal Register for a 30-day public comment period. Allow at least 90 days for the application to be processed.

**Note 4:** This application can only be used if you have hunted/will be hunting in South Africa. If you have or will be hunting in a different country, please use form 3-200-20

**Note 5:** *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:
  - 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;
  - 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
  - The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

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.  
Haroutyun Alajajyan, (b) (6) Chatsworth CA (b) (6)
2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?  
(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. How many Bontebok (*Damaliscus pygargus pygargus*) are you applying to import? Quantity: 1

a. At the time of the application, the specimen(s) is:

Alive      ☒ Dead

b. What is the approximate date of proposed take? \_\_\_\_\_

c. What is the date you took the animal? 04-16-17

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]:

Splitting Image Taxidermy PO Box 27582, Greenacres, Port Elizabeth South Africa 6057

5. ENTER the name and address of the landowner on whose property the bontebok was or will be taken:

Owners name: Philip Price  
Farm Name: Bowens Hope  
District: Tankstad  
Address: 5 Worchester St  
City: Grahamstown  
State/Province: Eastern Cape  
Country, Postal Code: 6140

Please be aware that the bontebok is listed in Appendix II of CITES. As such, you must obtain a CITES export permit from South Africa. If you are not exporting the trophy from South Africa directly to the United States, you will need to obtain a CITES Re-export certificate from the re-exporting country.

6. Attach a signed statement from the landowner giving you permission to cull a bontebok from their captive herd.
7. If available, provide a copy of the landowner's Certification of Registration for the bontebok herd. (Note: this is not a copy of the export permit or certificate issued by a South African province.) In order to meet the criteria for a permit under the Endangered Species Act, the bontebok must be culled from a ranch that has been certified by the Government of South Africa under their bontebok program. If the ranch is not registered, we may be unable to issue an import permit.



8. **Complete name and address of overseas person or business shipping the trophy to you (this name will appear on the face of the permit).**

Name: Ms. Shane Mac Donald  
Business Name: Splitting Image Taxidermy  
Address: PO Box 27582 Greenacres  
Address:  
City: Port Elizabeth  
State/Province: South Africa  
Country, Postal Code: 6057

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. **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).

Taxidermist/Broker's signature: \_\_\_\_\_ Date: \_\_\_\_\_

10. **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).

X 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 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, California 90501  
Phone: (310) 328-6307 Fax: (310) 328-6399  
fwsole\_lax@fws.gov

**GAME FARM HUNTING PERMIT**

(Issued in terms of the provisions of the  
National Environmental Management  
Biodiversity Act 2004 Act 10 of 2004)

PERMIT NUMBER: GFH 06409 B

NAME OF ISSUING AUTHORITY	
NAME	DEDCA
ADDRESS	PRIVATE BAG X 1006
ADDRESS	GRAHAMSTOWN
PROVINCE	EASTERN CAPE

DETAILS OF HUNTER	
NAME	Haroutyun
SURNAME	Alajjyan
POSTAL ADDRESS	
ADDRESS	(b) (6)
ADDRESS	(b) (6)
TOWN	CHATHAMSTOWN CA
POSTAL CODE	
PROVINCE	
PARTICULARS OF PROFESSIONAL HUNTER (in case of hunting client)	NAME AND SURNAME: Jaco De Jager
	CONTACT NUMBER: 083 274 0520
	PERMIT NUMBER: PH 176/2015 EC

DETAILS OF REGISTERED GAME FARM OWNER	
REGISTRATION CERTIFICATE NUMBER	27771
NAME: LANDOWNER	Eldred Charles Price
SURNAME: LANDOWNER	Price
REGISTERED FARM NAME AND NUMBER	Bowers Hope
FARM SIZE (ha)	16000
DISTRICT NAME	Tarkastad
PROVINCE	Eastern Cape

HUNTING METHOD	
HUNTING INSTRUMENT	7mm
HUNTING METHOD	Walk and stalk

DETAILS OF SPECIES INVOLVED			
SPECIES		SEX (if known)	QUANTITY
COMMON NAME	SCIENTIFIC NAME		
Black Wildebeest		Male	1 (one)

DETAILS OF RESTRICTED ACTIVITIES INVOLVED	
To hunt a Black wildebeest	

PERMIT VALIDATION			
DURATION OF THE HUNT	FROM: 15 April 2017	TO: 24 April 2017	
PERIOD OF VALIDITY	FROM:	TO:	
DATE ISSUED:			
SIGNATURE OF GAME FARM OWNER:	C. Price		
SIGNATURE OF HUNTER:	[Signature]		

NAME OF ISSUING OFFICER:		SIGNATURE OF ISSUING OFFICER:	
RECEIPT NUMBER			
STAMP OF ISSUING AUTHORITY:		2309	

DEPARTMENT OF ECONOMIC DEVELOPMENT  
AND ENVIRONMENTAL AFFAIRS



Quotation No: \_\_\_\_\_  
Client name: HAROUTYUN ALAJASYAN  
Postal Address: \_\_\_\_\_ (b) (6)  
CIR , CHATHAM CA (b) (6)

Custom Agent Details: \_\_\_\_\_

**e Mail:**

e Mail: \_\_\_\_\_ Date: \_\_\_\_\_

### Special instructions

**Balance**

Dupli-Print, Gen

2310

Client Signature

P.H. Signature:

Outfitter Signature: \_\_\_\_\_

**GAME FARM HUNTING PERMIT**

PERMIT NUMBER: GFH 03985 B

(Issued in terms of the provisions of the  
National Environmental Management:  
Biodiversity Act 2004, Act 10 of 2004)

NAME OF ISSUING AUTHORITY	
NAME	DEDEAT
ADDRESS	Private Bag X 1506
ADDRESS	GRAHAMSTOWN
PROVINCE	EASTERN CAPE

DETAILS OF HUNTER	
NAME	Haroutyan
SURNAME	Alajayan
POSTAL ADDRESS	(b) (6)
ADDRESS	(b) (6)
ADDRESS	(b) (6) Chatsworth
TOWN	CA
POSTAL CODE	(b) (6)
PROVINCE	
PARTICULARS OF PROFESSIONAL HUNTER (in case of hunting client)	NAME AND SURNAME: Jacc De Jager CONTACT NUMBER: 083 274 0570 PERMIT NUMBER: PH 176/2015 EC

DETAILS OF REGISTERED GAME FARM OWNER	
REGISTRATION CERTIFICATE NUMBER	C9/112986013
NAME LANDOWNER	Lucius
SURNAME LANDOWNER	Corbett
REGISTERED FARM NAME AND NUMBER	Ezulu Game Reserve
FARM SIZE (ha)	29 000 ha
DISTRICT NAME	Bedford
PROVINCE	Eastern Cape

HUNTING METHOD	
HUNTING INSTRUMENT	7mm
HUNTING METHOD	Walk and stalk

DETAILS OF SPECIES INVOLVED			
SPECIES		SEX (if known)	QUANTITY
COMMON NAME	SCIENTIFIC NAME		
Bontebok		Male	1 lone

DETAILS OF RESTRICTED ACTIVITIES INVOLVED	
To hunt a bontebok	

PERMIT VALIDATION			
DURATION OF THE HUNT	FROM:	15 April 2017	TO: 24 April 2017
PERIOD OF VALIDITY	FROM:		TO:
DATE ISSUED:			
SIGNATURE OF GAME FARM OWNER:	C. Price		
SIGNATURE OF HUNTER:			

		DEPARTMENT OF ECONOMIC DEVELOPMENT AND ENVIRONMENTAL AFFAIRS	
NAME OF ISSUING OFFICER:		SIGNATURE OF ISSUING OFFICER	
RECEIPT NUMBER			
STAMP OF ISSUING AUTHORITY:	2311	2016-08-16	



13 April 2017

**TO WHOM IT MAY CONCERN**

I, Charles Price, (ID 6702135009087), of Ezulu Game Reserve hereby give  
Mr Haroutyun Alajajyan of (b) (6) Chatsworth, CA  
(b) (6) USA, permission to hunt a Bontebok ram from the captive herd on the  
property eZulu (GH CAE 01\_17) in the Bedford district from 15 – 24 April 2017.

Yours sincerely

**CHARLES PRICE**

**EZULU GAME RESERVE**



# SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION



No: 41659

Professional Hunters' Association of South Africa

Duration of Hunt: Commenced 15 April 2017 Terminated 24 April 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) <input checked="" type="checkbox"/>	Northern Cape (NC)
---------------------	-----------------	--------------	-----------------------	-----------------	------------------	-------------------	---	--------------------

Post Permit to (Mark correct block with X)

**PROFESSIONAL HUNTER**

Name: Jaco de Jager  
 Business Address: P.O. Box 877  
 GRAHAMSTOWN  
 Code: 6140  
 ID No: 7603065187084  
 PH Permit No: PH 176/2015 EC  
 Date: 24-4-17 Signature: [Signature]

**CLIENT**

Name: HAROUTYUN ALASATYAN  
 Permanent Postal Address: [Redacted]  
 RIDGE CIR CAHATSWORTH  
 Country: [Redacted] Tel/Fax: [Redacted]  
 Passport No: [Redacted]  
 Email: [Redacted]  
 Date: 24-4-17 Signature: [Signature]

**HUNTING OUTFITTER**

Name: EZULU Game Reserve  
 Business Address: P.O. Box 112  
 Queenstown Code: 5320  
 I.D. No: 6702113500987  
 Tel No: 0422351624 Fax No: 0422351625  
 HO Permit No: HC 65/2013 EC  
 Date: 24-4-17 Signature: C. Price

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 M	Parts of Trophy to be Exported
EZULU	Bedford	E.C. Price	GHCAE		Bontebok	1	✓	skull + horns + Cape + b. skin
"	"	"	21-17		Gemsbuck	1	✓	" " " "
"	"	"	"		Impala	1	✓	" " " "
"	"	"	"		Kudu	1	✓	" " " "
"	"	"	"		Ostrich	1	✓	Full cape
"	"	"	"		Sable	1	✓	skull + horns + Cape + b. skin
"	"	"	"		Cape springbuck	2	✓	2 skull + horns + Cape + full cape
"	"	"	"		Steenbuck	1	✓	skull + horns + cape full
"	"	"	"		Waterbuck	1	✓	skull + horns + Cape + b. skin
"	"	"	"		Zebra	1	✓	Cape + bad skin
Bowers Hope	Tarkastad	E.C. Price	E031206 QU		Black wildebeest	1	✓	skull + horns + cape + b. skin

Address to which trophies are to be sent:

Code: Country: Trophy Export Date (Estimate):

Conservation Levy

Total:

Copies: Client Original White  
 Hunting Outfitter 1st Copy Pink  
 Taxidermist 2nd Copy Blue  
 Professional Hunter 3rd Copy Green  
 Last Copy Yellow

Forward to Nature Conservation Authority where hunt took place  
 Retain for a period of three years  
 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.

# ***Certificate of Registration***

## ***BONTEBOK HERD***



***It is hereby certified that the  
Bontebok herd on  
the property Ezulu, of  
Mr.E.C Price,  
in the Bedford District of the Eastern Cape,  
South Africa, is certified as pure on the  
12 April 2011***

***Presented to Mr.E.C.Price  
Date: 12 April 2011***

***For; General Manager: Environmental Affairs***

**Issued by: Department of Economic Development and Environmental Affairs  
Province of the Eastern Cape**

HAROUTYUN ALAJANIAN

(b) (6)

(b) (6) NEW YORK, NY

(b) (6)

3/8/18

Date

(b) (6)

Pay To The  
Order Of

US Fish and Wildlife serv \$ 100.00  
One hundred

Dollars

Bank of America

Valued Customer  
OVER 10 YEARS

Photo  
Safe  
Deposit®  
Check on back

ACH R/T 121000358

For

(b) (6)

(b) (6)

ES

ASP



Hubbard, Rogelio &lt;rogelio\_hubbard@fws.gov&gt;

---

CITES APPLICATION

1 message

Hubbard, Rogelio &lt;rogelio\_hubbard@fws.gov&gt;

Mon, Apr 2, 2018 at 12:42 PM

To: (b) (6)

Good afternoon Alajajyan,

Ref: 83079c

Our office received a permit application request for the import. In order to comply with your request, please reply to the following:

1. Please sign and date Section D on page 1.
2. Please sign and date question number 10 on page 4.

<https://www.fws.gov/forms/3-200-22.pdf>

In accordance with 50 CFR 13.111(e) if the requested information is not received by this office by 05/16/2018 45days 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.

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

Respectfully,

Rogelio P. Hubbard  
Legal Instrument Examiner  
U.S. Fish and Wildlife Service  
International Affairs  
Division of Management Authority - CITES  
5275 Leesburg Pike  
Falls Church, Virginia 22041-3803  
t. 703.358.2692  
[www.fws.gov](http://www.fws.gov)  
[www.cites.org](http://www.cites.org)



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 OF BONTEBOK  
TROPHIES FROM SOUTH AFRICA**

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 <b>Alajjyan</b>	1 b. First Name <b>Haroutyun</b>	1 c. Middle Name/Initial	1 d. Suffix
2. Date of Birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Telephone Number	3 a. Alternate Telephone Number	4. E-mail address

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

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

**Section C: All applicants complete address information**

1 a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes) <b>22448 Summit Ridge Cir</b>				
1 b. City <b>Chatsworth</b>	1 c. State <b>CA</b>	1 d. Zip code/Postal code <b>(b) (6)</b>	1 e. County/Province <b>Los Angeles</b>	1 f. Country <b>USA</b>
2 a. Mailing address (include if different than physical address, include name of company, 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)  <div style="display: flex; justify-content: space-between;"> <div> </div> <div> <b>04/03/2018</b> </div> </div>	

Please continue to next page



**IMPORT OF SPORT-HUNTED BONTEBOK TROPHIES from South Africa**

**Note 1:** If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit to the address on page one.**

**Note 2:** 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:** The bontebok is listed as endangered under the Endangered Species Act. Applications for endangered species permits must be published in the Federal Register for a 30-day public comment period. Allow at least **90 days** for the application to be processed.

**Note 4:** This application can only be used if you have hunted/will be hunting in **South Africa**. If you have or will be hunting in a different country, please use form 3-200-20

**Note 5:** *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 handcraft items made from the sport-hunted animal only when:
  - 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;
  - 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
  - The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

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.  
Haroutyun Alajajyan, (b) (6) Chatsworth CA (b) (6)
2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?  
Eliza Alajajyan, (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. How many Bontebok (*Damaliscus pygargus pygargus*) are you applying to import? Quantity: 1

a. At the time of the application, the specimen(s) is:

Alive      ☒ Dead

b. What is the approximate date of proposed take? \_\_\_\_\_

c. What is the **date** you took the animal? 04-16-17

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]:

Splitting Image Taxidermy PO Box 27582, Greenacres, Port Elizabeth South Africa 6057

5. ENTER the name and address of the **landowner** on whose property the bontebok was or will be taken:

Owners name: Philip Price

Farm Name:

District:

Address: 5 Worchester St

City: Grahamstown

State/Province:

Country, Postal Code: Eastern Cape

6140

**Please be aware that the bontebok is listed in Appendix II of CITES. As such, you must obtain a CITES export permit from South Africa. If you are not exporting the trophy from South Africa directly to the United States, you will need to obtain a CITES Re-export certificate from the re-exporting country.**

6. Attach a signed statement from the **landowner** giving you permission to cull a bontebok from their captive herd.
7. If available, provide a copy of the landowner's Certification of Registration for the bontebok herd. (Note: this is not a copy of the export permit or certificate issued by a South African province.) In order to meet the criteria for a permit under the Endangered Species Act, the bontebok must be culled from a ranch that has been certified by the Government of South Africa under their bontebok program. If the ranch is not registered, we may be unable to issue an import permit.

8. **Complete name and address** of overseas person or business shipping the trophy to you (this name will appear on the face of the permit).

Name: Ms. Shane Mac Donald  
Business Name: Splitting Image Taxidermy  
Address: PO Box 27582 Greenacres  
Address:  
City: Port Elizabeth  
State/Province: South Africa  
Country, Postal Code: 6057

**CERTIFICATION STATEMENT** (original signature must be provided for either 9 or 10 below)

9. **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**).

Taxidermist/Broker's signature: \_\_\_\_\_ Date: \_\_\_\_\_

10. **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**).

**X**

Applicant's signature: \_\_\_\_\_

Date: \_\_\_\_\_

04/03/2018

*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.*

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).

Los Angeles, CA  
370 Amapola Ave., #114  
Torrance, California 90501  
Phone: (310) 328-6307 Fax: (310) 328-6399  
fwsole\_lax@fws.gov



# 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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March 28, 2018

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

RCVD MAR 30 2018

Re: Applications for Import of Sport-Hunted Trophies

Dear Acting Chief:

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

- The first applicant is hunting an elephant on communal land in the Southeastern Lowveld range of Zimbabwe. The proceeds of this hunt benefit CAMPFIRE communities, as detailed in the various CAMPFIRE reports submitted to the DMA by Conservation Force, the Zimbabwe Parks and Wildlife Management Authority (ZPWMA), and the CAMPFIRE Association. Moreover, the elephant population in this range area in Zimbabwe is increasing, as reflected in the most recent survey reports. Please consider the enclosed documents and all information in the DMA's files regarding the benefits of elephant hunting in Zimbabwe in making a positive enhancement finding for this applicant.
- The second applicant is hunting an African lion in the Matetsi region of Zimbabwe with Martin Pieters Safaris. In April 2016, we provided significant enhancement information from this operator, and information about the increasing lion population in this area and the benefits of lion hunting in Zimbabwe was provided in the October 2016 non-detriment and enhancement finding from ZPWMA. Please consider that information, and all other information provided by Conservation Force, ZPWMA, Zimbabwean operators, and CAMPFIRE communities 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



**NOTICE OF REPRESENTATION**

RCVD MAR 30 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 Bull Elephant 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: \_\_\_\_\_

(b) (6)

Name: Steven (b) (6) Reeves

Date: 7 March 2018





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-1A  
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 MAR 30 2018

LB

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

A. Complete if applying as an individual			
1.a. Last name Reeves	1.b. First name Steven	1.c. Middle name or initial (b) (6)	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 Hooper	1.c. State UT	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 – <b>attach documentation of fee exempt status as outlined in instructions.</b> (50 CFR 13.11(d))	
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in <b>Title 50, Part 13 of the Code of Federal Regulations</b> and the other <b>applicable parts in subchapter B of Chapter I of Title 50</b> , 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 for permit (No photocopied or stamped signatures)	Date of signature (mm/dd/yyyy) 7 March 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](mailto: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.

*LOXODONTA AFRICANA, ELEPHANT*

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, SENONE 1 + 2 TTL (CAMPFIRE AREAS)*

b. Date wildlife is to be hunted: *APRIL 13-24, 2018*

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

*SSG SAFARIS, NIXON DZINGAI, OWNER + 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:

*N/A*

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 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: JSC SAFARI  
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?

PLEASE SEE ATTACHED +  
INFORMATION 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?

SEE 9.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?

SEE 9.A

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

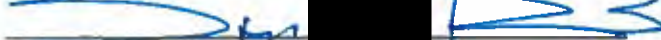
10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

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:  (b) (6) Date: 7 March 201

*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).



## Steven Reeves Permit Application

### 9. B:

This declaration is made by the Zimbabwean hunting operator:

**We charge 1.400 USD per day on elephant hunts as our daily rate that broken down as follows:**

15% of the daily rate goes to the hunting agent that books the hunt.

250 USD per day goes to the professional hunter that guides the hunt, this includes the clients hiring of his modern 4x4 hunting vehicle for purposes of the hunt.

We pay the fuel for the vehicle, usually around 50 litres per day @ 2 usd per litre in Zimbabwe = 100 USD

We use 2 trackers on elephant hunts @ 30 USD each per day daily rates = 60 USD per day.

We provide accommodation including housekeeping and a laundry service = 150 USD per day.

We cater for the clients' food and drinks including alcohol = 120 USD per day.

We provide a cook and a waitress plus kitchen cleaning staff @ 30 USD each per day x 4 = 120 USD per day.

We pay a Zimbabwe National Parks game scout to National Parks 75 USD per day to observe the hunt on behalf of the Government.

We feed all persons on the hunt not only the client.

We charge 15.500 USD for each elephant hunted.

**We pay 12.500 USD of that amount to the local community on the following basis:**

55% goes to the local rural African community that they use for schools, medical care, food, clothes roads and infrastructure.

4% goes to the campfire program, there is lots of information about the campfire project online: [https://en.wikipedia.org/wiki/Communal\\_Areas\\_Management\\_Programme\\_for\\_Indigenous\\_Resources](https://en.wikipedia.org/wiki/Communal_Areas_Management_Programme_for_Indigenous_Resources)

41% goes to the Chiredzi Rural District Council (CRDC) this money is used by the council to increase/better the living conditions of the local people that live with these animals and suffer damages to their crops as a result of the human/animal conflict that exists in our areas and is getting worse year on year.

These trophy fee payments allow for the local people to be more tolerant of the animals that co-exist with them in these areas.

## **Steven Reeves Permit Application**

### **9. C:**

**We employ 4 full time anti-poaching personnel who patrol the hunting area on a full time rotational basis to help stop poaching in our areas that for now we have under control, without these hunts our ability to perform anti poaching duties is impossible.**

**We employ 19 full time staff members that without our safari operation would be un-employed; the meat from our hunts gets distributed amongst the local people including the families of our staff at no charge at all, this much needed protein that would otherwise not be available at all, this is rural Africa.**

**The local people tolerate these elephants, buffalos and lions destroying their crops and cattle on the basis of the compensation agreements we have with them, if these animals were not paying their way they would not be tolerated in these areas by the locals due the damage they cause in the human/wild animal conflict.**

**It is of the utmost importance in terms of safe guarding the animals that the hunting operations and hunting operators are allowed to continue their work, or sadly these animals will all be destroyed by the locals.**

**We are an African based, African owned, African run Safari operation, we were born in these areas and have worked these areas all our lives and cared for the animals that exist here all our lives.**

**We do not hunt female or breeding animals at all; we hunt only the old males/old bulls.**

**Best regards**

**Nixon Dzingai (pictured below)**

**Owner: SSG Safaris:**

Steven Reeves Permit Application







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:** Division of Management Authority (DMA)  
U.S. Fish and Wildlife Service  
4401 N. Fairfax Drive, Room 212  
Arlington, VA 22203  
1-800-358-2104 or 703-358-2104

**Type of Activity:**  
Import of Sport-hunted Trophies of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros

RCVD JAN 12 2015

LB

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

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

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) <u>(b) (6)</u>					
1.b. City <u>Alma</u>	1.c. State <u>MI</u>	1.d. Zip code/Postal code: <u>(b) (6)</u>	1.e. County/Province	1.f. Country <u>USA</u>	
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)					
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country	

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <u>Clark Lincoln</u> Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures)
	<u>11/9/2015</u> Date of signature (mm/dd/yyyy)

Please continue to next page



**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**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 were 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:** The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

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, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:

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

Mozambique, Luatize Management Unit,  
Niassa Natibnal Reserve, Hunting Block L2,  
Lishinga

b. Date wildlife was hunted:

4/29/2015

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

Skull/Full skin

- 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 Textafrica, Bairro Da Soalpo, Chimoio, Mozambique  
Tel +258 251 24661 Fax +258 251 24657 mozinfo@emiac.com

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 appear on the face of the export permit].

Name: EMIAC Moz Lda  
Address: Complexo Textafrica  
City: Bairro Da Soalpo  
County, Postal Code: Chimoio  
Mozambique

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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:** \_\_\_\_\_

Clark Lincoln

**Date:** 11/9/2015

*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.*

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).

Chicago - ORD

9. 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):

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):

Clark Lincoln

(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.

RCUD JAN 12 2016

(b) (6)

(b) (6)

MERCANTILE BANK OF MICHIGAN  
(616) 406-3000

*Pay to the order of US Fish & Wildlife Service 100 <sup>00</sup>/<sub>100</sub>*  
*One hundred & 00/100*

*12/4 US*

76-1382-724  
RECEIVED  
FEB 11 2016  
FEDERAL RESERVE BANK  
OF NEW YORK

(b) (6)

*Ann Lincoln*



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: 1A  
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 MAR 15 2016

LB

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

A. Complete if applying as an individual			
1.a. Last name Bedford	1.b. First name Terry	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	(see instructions)
5.a. Telephone number (b) (6)	5.b. Alternate telephone number (b) (6)	5.c. Business e-mail address (b) (6)	5.d. Business fax number (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 n/a	1.b. Doing business as (dba) n/a		
2. Tax identification no. n/a	3. Description of business, agency, Tribe, or institution n/a		
4.a. Principal officer Last name n/a	4.b. Principal officer First name n/a	4.c. Principal officer Middle name/ initial n/a	4.d. Suffix n/a
5. Principal officer title n/a		6. Primary contact name n/a	
7.a. Business telephone number n/a	7.b. Alternate telephone number n/a	7.c. Business fax number n/a	7.d. Business e-mail address n/a

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 Bakersfield	1.c. State CA	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) n/a				
2.b. City n/a	2.c. State n/a	2.d. Zip code/Postal code: n/a	2.e. County/Province n/a	2.f. Country 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 <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: n/a No <input checked="" type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) 3-14-2016 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.  
(male) Leopard Panthera pardus
  - 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 ... Burko (Monduli Area) .... North Masailand .....
  - b. Date wildlife is to be hunted:  
August 2016
  - 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 and 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):  
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:

Business Name: Robin Hurt Safaris

Address: P.O. Box 755

Address:

City: Manyuki 10400

State/Province:

Country, Postal Code: Kenya

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: 3-14-2016

*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):

same as page one

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):

Terry Bedford

(b) (6)

(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.

n/a

SECURITY FEATURES INCLUDE TRUE WATERMARK PAPER, HEAT SENSITIVE ICON AND FOIL HOLOGRAM

(b) (6)

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(b) (6)

03/14/2016

PAY TO THE ORDER OF U.S. Fish and Wildlife Service

\$ \*\*100.00

One hundred and 00/100

DOLLARS

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

MEMO

(b) (6)



AUTHORIZED SIGNATURE

Details on Back

Security Features Included

MAR 15 2016



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

RCVD APR 20 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 of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros**

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 <b>Hildreth</b>	1.b. First name <b>LAWRENCE</b>	1.c. Middle name or initial <b>(b) (6)</b>	1.d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Social Security No. <b>(b) (6)</b>	4. Occupation <b>(b) (6)</b>	5. Affiliation/ Doing business as (see instructions)
6.a. Telephone number <b>(b) (6)</b>	6.b. Alternate telephone number <b>(b) (6)</b>	6.c. Fax number <b>(b) (6)</b>	6.d. E-mail address <b>(b) (6)</b>

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>(b) (6)</b>				
1.b. City <b>Tyler</b>	1.c. State <b>Texas</b>	1.d. Zip code/Postal code: <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: <b>44242A</b> No <input type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter 1 of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief <b>(b) (6)</b> and that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <b>Lawrence Hildreth</b> Signature (in blue ink) of applicant responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) <b>April 14, 2016</b>

Please continue to next page



**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**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 were 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:** The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a 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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. 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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: N/A (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: N/A (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

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

AREA WHERE LEOPARD TO BE HUNTED: CHIFUNDA

CLOSEST TOWN: CHAMA

CLOSEST CITY: LUSAKA

b. Date wildlife is to be hunted:

3 AUG 2016 - AUG 25, 2016

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

B. LIFE SIZE MOUNT

3. **IF THE ANIMAL IS DEAD**, please enter the following:

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

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 document]:
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 appear on the face of the export permit].

Name: MUCHINGA ADVENTURES LTD  
Business Name:  
Address: P.O. Box 390003  
Address: LUMUMBA RD  
City: LUSAKA  
State/Province:  
Country, Postal Code: ZAMBIA

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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:  (b) (6)  Date: April 14, 2016

*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.*

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 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):

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):

LAWRENCE Hildreth

(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.

RCVD APR 20 2016

(b) (6)

(b) (6)

DATE 14 April 16

PAY TO THE ORDER OF U.S. Fish and Wildlife Service \$ 100.<sup>00</sup>/<sub>100</sub>

One Hundred Dollars and <sup>No</sup>/<sub>100</sub>

DOLLARS



Security Features  
Details on Back



**REGIONS**

FOR Leopard Permit

Lance Pal Hebert

(b) (6)

March 12, 2018

RCVD MAR 16 2018

Department of the Interior  
US Fish and Wildlife Service  
Division of management Authority  
Branch of Permits, MS: IA  
5275 Leesburg Pike  
Falls Church, VA 22041-3803

RE: Permit #MA98737B-0

TO WHOM IT MAY CONCERN:

I am applying for a reissue of the above mentioned permit. I hunted successfully in Kyrgyzstan in November 2016. I was unable to import my trophies as my Kyrgyzstan outfitter experienced a family death which delayed my export - unfortunately past my permit date.

I've enclosed the required paperwork and fees for permit reissuance.

Your prompt attention to this matter is most appreciated.

Sincerely,



ROBERT (b) (6) MCCCULLOCH

(b) (6)

Phoenix, AZ (b) (6)

(b) (6)





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  
(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.)


RCVD MAR 16 2018

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 McCulloch	1.b. First name Robert	1.c. Middle name or initial (b) (6)	1.d. Suffix
2.a. Date of birth (mm/dd/yyyy) (b) (6)	2.b. Social Security No. (b) (6)	2.c. (b) (6)	2.d. Affiliation/ Doing business as (see instructions) N.A.
3.a. Telephone number (b) (6)	3.b. Alternate telephone number	3.c. Fax number	3.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. (b) (6) Street #, Suite #, or Room #; no P.O. Boxes			
1.b. City PHOENIX	1.c. State AZ	1.d. Zip code/Postal code: (b) (6)	1.e. Country/Province (b) (6)
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 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 <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA98737B-0 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.  Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures)	
Date of signature (mm/dd/yyyy) 3/12/2018	

**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 MA 987378-0
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: 3/12/2018

- 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):

*Robert McCullough*  
(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.



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

FEDERAL FISH AND WILDLIFE PERMIT

I. PERMITTEE

ROBERT (b) MCCULLOCH  
(b) (6) (b) (6)  
PHOENIX, AZ (b) (6)  
U.S.A.

2. AUTHORITY-STATUTES  
16 USC 1533(d)

REGULATIONS  
50 CFR 17.32

3. NUMBER  
MA98737B-0

4. RENEWABLE  
☐ YES  
☒ NO

5. MAY COPY  
☒ YES  
☐ NO

6. EFFECTIVE  
09/12/2016

7. EXPIRES  
09/11/2017

8. NAME AND TITLE OF PRINCIPAL OFFICER (If #1 is a business)

9. TYPE OF PERMIT

KYRGYZ ARGALI-THREATENED SPECIES IMPORT

10. LOCATION WHERE AUTHORIZED ACTIVITY MAY BE CONDUCTED  
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

II. CONDITIONS AND AUTHORIZATIONS:

- A. GENERAL CONDITIONS SET OUT IN SUBPART D OF 50 CFR 13, AND SPECIFIC CONDITIONS CONTAINED IN FEDERAL REGULATIONS CITED IN BLOCK #2 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.
- B. THE VALIDITY OF THIS PERMIT IS ALSO CONDITIONED UPON STRICT OBSERVANCE OF ALL APPLICABLE FOREIGN, STATE, LOCAL, TRIBAL, OR OTHER FEDERAL LAW.
- C. VALID FOR USE BY PERMITTEE NAMED ABOVE.
- D. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).
- E. Authorized to import, for personal non-commercial use, the sport-hunted trophy of one male Marco polo argali (*Ovis ammon polii*) taken during the 2016/2017 (August 15 to November 30, 2016 and January 1 to March 1, 2017) hunting season from the Naryn region of the Kyrgyz Republic.
- F. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of the Kyrgyz Republic for the 2016/2017 season.
- G. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit issued by the Kyrgyz Management Authority.
- H. No specimens for these imports may be hunted in areas that may contain populations of the Tien Shan argali (*Ovis ammon karelini*). Based on this information, Marco Polo argali (*O. a. polii*) for these imports may only be hunted in the southern Kyrgyz Republic west of the Uzengikush River basin (approximately 77° longitude). Specific areas that apparently contain huntable populations consisting of only the Marco Polo argali subspecies, and therefore suitable for hunting trophies for these imports, include the Myrdyunum, Aksai, Atbashi, Kara-Koyun, and Arpa river basins, the Alai Valley, and the southern Fergana Range.
- I. If no trophy is imported, this permit should be returned to the Division of Management Authority on or before the expiration date.

☒ ADDITIONAL CONDITIONS AND AUTHORIZATIONS ALSO APPLY

12. REPORTING REQUIREMENTS

ISSUED BY

TITLE

CHIEF, BRANCH OF PERMITS, DMA

DATE

09/12/2016



ROBERT [REDACTED] MCCULLOCH  
Phoenix, AZ [REDACTED]

Pay to the Order of U.S. Fish and Wildlife Service 3/12 2018 [REDACTED] (b) (6)

One hundred, 00/100 \$100.00

JPMorgan Chase Bank, N.A. Dollars

CHASE PRIVATE CLIENT CHECKING

[REDACTED] [REDACTED] [REDACTED] (b) (6) (b) (6) (b) (6)



**Permit Number: MA98737B-1**  
Effective: 03/26/2018 Expires: 03/25/2019

**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

  
CHIEF, BRANCH OF PERMITS, DMA

**Permittee:**

ROBERT (b) (6) MCCULLOCH  
(b) (6)  
PHOENIX, AZ (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

**Authorizations and Conditions:**

- 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 2016 / 2017 (August 6, 2017 to November 30, 2016 and January 1, 2017 to March 1, 2017) hunting season from the Naryn region of the Kyrgyz Republic.
- B. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of the Kyrgyz Republic for the 2016 / 2017 season.
- C. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit issued by the Kyrgyz Management Authority.
- D. No specimens for these imports may be hunted in areas that may contain populations of the Tien Shan argali (*Ovis ammon karelini*). Based on this information, Marco Polo argali (*O. a. polii*) for these imports may only be hunted in the southern Kyrgyz Republic west of the Uzengikush River basin (approximately 77° longitude). Specific areas that apparently contain huntable populations consisting of only the Marco Polo argali subspecies, and therefore suitable for hunting trophies for these imports, include the Myurdyurum, Aksai, Albashi, Kara-Koyun, and Arpa river basins, the Alai Valley, and the southern Fergana Range.
- E. If no trophy is imported, this permit should be returned to the Division of Management Authority on or before the expiration date.
- 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.
- H. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law.
- I. Valid for use by permittee named above.

RCVD JUL 11 2017



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

OMB No. 1018-0164  
Expires 11/30/2016

# 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 of  
Southern African Leopard, African Elephant, and  
Namibian Southern White Rhinoceros

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 McBurnett	1.b. First name David	1.c. Middle name or initial (b) (6)	1.d. Suffix	
2. Doing business as (see instructions) (b) (6)				
5.a. Telephone number (b) (6)	5.b. Alternate telephone number	5.c. Fax number	5.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		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 San Antonio	1.c. State TX	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province (b) (6)	1.f. Country 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

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input checked="" type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.	
Signature of applicant/person responsible for permit (No photocopied or stamped signatures) <i>C. Ruelson, ATTY IN FACT / WELLLU WORLDWIDE</i>	Date of signature (mm/dd/yyyy) 07/03/2017

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS**

**Note 1:** If you hold an import permit for a 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; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

**Note 2:** *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 3:** 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 applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: \_\_\_\_\_ (Import is limited to two per hunter per calendar year)

**Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: \_\_\_\_\_ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

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, horns, tusks).

3. IF THE ANIMAL IS DEAD, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild:
- b. Date wildlife was hunted: Antoinette & Antoinette Ext. Dete Valley 2, Railway 35, Matabeleland North, S.Africa -- 7-23-2014
- 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 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 document]:

Safari Taxidermy 47 Goud St. Laboria, Polowane 0704 RSA

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 appear on the face of the export permit].

Name: Business Safari Taxidermy  
Name: Address: 47 Goud St.  
Address: Laboria  
City: Polokwane 0704  
State/Province: RSA  
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to 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., 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. I understand that my client may only import two African elephant trophies in one calendar year. 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:

2-3-17

ATTY IN FACT



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. I understand that I may only import two African elephant trophies in one 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.*

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

9. 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):

WELL Worldwide Energy Logistics, 17401 Aldine Westfield Rd. Houston, Texas 77073

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.

FED EX ENVELOPE (INCLUDED)

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

Cindi- WELL- 281-606-2400 [crulon@well-usa.com](mailto:crulon@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.

U.S. CUSTOMS POWER OF ATTORNEY  
for a

U.S. RESIDENT IMPORTER & EXPORTER

Department of Homeland Security  
US Customs and Border Protection  
19 CFR 141.32

Phone#

Cell Phone

Email#

Check appropriate box(es)

Individual

Partnership

Corporation

Other

United Liability Company



SSN#

KNOW ALL MEN BY THESE PRESENTS, That (b) (6)

DAVID

(b) (6)

McBURNETT

(your name)

My address is

Home address (b) (6)

SAN ANTONIO, TX

(b) (6)

hereby constitutes and appoints WELL Petroleum Energy Logistics, Inc. to act through its officers, employees and specially designated agents

As a true and lawful agent and attorney of the Grantor named above for and in the name, place and stead of said Grantor from this date and in all Customs Districts, and in no other name to make, sign, declare, or swear to any entry, withdrawal declaration, certificate, bill of lading, or other document 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; to make entry and collect drawback; and to make, sign, declare, or swear to any statement, supplemental statement, schedule, supplemental schedule, certificate of delivery, certificate of manufacture, certificate of manufacture 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, statement, schedule, certificate, abstract, declaration, or other affidavit or document is intended for filing in any other 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 exported with or without benefit of drawback or in connection with the entry, clearance, lading, unloading or unloading of any vessel or other means of conveyance owned or operated by said Grantor, and any and all bonds of which may be voluntarily given and accepted under applicable laws and regulations, consignor's and owner's declaration provided for in section 465 Tariff Act of 1930 amended or otherwise 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, unloading, or operation of any vessel or other means of conveyance owned or operated by Grantor;

To grant powers of attorney on behalf of said Grantor to other Customs Districts to act as said Grantor's agent, to receive, endorse and collect checks issued for Customs duty refunds in said Grantor's name drawn on the Treasurer of the United States;

And generally to transact at the customhouse in said district any and all customs business, including making, signing, and filing of protests under section 514 of the Tariff Act of 1930, in which said Grantor is or may be concerned or interested and which may properly be restricted or performed by an agent and attorney using said agent and attorney full power and authority to do anything whatsoever 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

(b) (6)

If Grantor is a partnership or LLC, signatory certifies that he/she has full authority to execute this instrument on behalf of Grantor and shall state the names of all members and/or directors on a separate addendum to this document, and said the power shall in no case expire any force or effect beyond two years from the date of its execution.

Grantor further authorizes Grantor to act as its agent in signing or endorsing export documents, i.e., commercial invoices, shipper's export declarations, Automated Export System records, bills of lading, insurance certificates, drafts and any other documents necessary to the successful completion of any export transaction on its behalf.

If Grantor is a U.S. Principal Party in Interest (USPFI) in an export transaction then the Grantor/USPFI hereby certifies that all statements and information contained in the documentation provided to Customs relating to exportation are true and correct. Furthermore, Grantor/USPFI understands that civil and criminal penalties may be imposed for making false or fraudulent statements or for the violation of any United States laws or regulation on exportation. Grantor/USPFI undertakes to determine any export license requirements and to obtain, for export purposes, any export license or other official authorization.

All services and transactions are subject to WELL's Terms and Conditions of Service (WELLFA 6794) which are included in this document for which Grantor expressly acknowledges making a written copy. To the extent provided by law, WELL's liability as a Customs Broker is limited to \$50.00 (19 USC 1541(c)).

IN WITNESS WHEREOF, the (b) (6) Grantor has caused these presents to be signed and signed.

(Signature) X David

(b) (6)

McBURNETT

(Capacity) (7)

(Print name) (b) (6)

X David

(b) (6)

McBURNETT

(Date) (b) (6)

5/22/17

If you are the importer of record, please note that the broker will not relieve you of liability for Customs charges (duty, taxes, or other duties owed Customs) in the event the charges are not paid by the broker. Therefore, if you pay by check, Customs charges may be paid with a separate check payable to the Bureau of Customs and Border Protection which shall be delivered to Customs by the broker (19 CFR 111.25). If you elect to make payment with a check made payable to the Bureau of Customs and Border Protection, no payment will be made in advance.

Rev. 10/2017

RCVD JUL 11 2017

WELL WORLDWIDE ENERGY LOGISTICS INC.  
17401 ALDINE WESTFIELD RD  
HOUSTON, TX 77073-5001  
T: 281-606-2400

(b) (4)

(b) (4)

7/5/2017

PAY TO THE  
ORDER OF

US FISH & WILDLIFE SERVICE

\$

\*\*\*100.00

One Hundred and 00/100\*\*\*\*\*

DOLL

US FISH & WILDLIFE SERVICE

MEMO



AUTHORIZED SIGNATURE

(b) (4)